

DOE 1-M-18 Cuttings Management Area Project Summary Continued from Form 2A – Doc #401671641

Secondary Cuttings Management Area: The existing RWF 44-18 pad (COGCC Location ID 335146, Form 4 Doc #401674816) will be re-constructed within the boundaries of the previously disturbed area of the pad and will accommodate the remaining volume of drill cuttings from the DOE 1-M-18 well pad. Excavated material from the trench will be used to expand the pad to the south to support drill cuttings management operations at this location. Excess material excavated from the trench will be stockpiled north of the pad. Topsoil will also be stripped and stockpiled separately until it is needed for reclamation.

The general protocol for managing cuttings at these locations is as follows: Cuttings from each new well will be segregated and placed into the cuttings trench(s) and periodically sampled to determine if the drill cuttings meet COGCC 910-1 standards. Additional treatment / amendment of the cuttings may be occasionally needed to ensure that COGCC 910-1 standards are met prior to reclamation. If needed, clean fill material may be mixed with the cuttings to ensure that cleanup standards are met. Confirmation samples of the blended material will be collected and submitted to an approved analytical laboratory and analyzed for the full COGCC 910-1 list of organic, inorganic, and metal compounds (in soils) to ensure that these materials comply with COGCC cleanup standards. If sample results indicate that any of the inorganic parameters (i.e., Sodium Absorption Ratio, Electrical Conductivity, etc.) exceed their respective cleanup standards / background concentrations, these materials must be covered with a minimum cap of 3-ft of clean material (i.e., soils meeting 910-1 cleanup standards). Representative samples from the entire volume of the drill cuttings trench will be collected and analyzed to ensure compliance with COGCC 910-1 cleanup standards prior to reclaiming the cuttings trench. If the composition of the cuttings is verified to comply with the entire list of 910-1 cleanup standards (including the inorganic parameters), these materials may be either buried in-situ within the cuttings trench, or they may be re-used on the fill slope as needed to help shape and contour the pad in preparation for interim reclamation activities as outlined in COGCC's Interim Reclamation requirements of COGCC Rule 1003. In addition, storm water BMPs will be installed and maintained as per the site-specific Storm Water Management Plan that has been prepared for each location. Both pads are included in TEP's storm water management program and will be inspected and maintained per COGCC Site Stabilization and Storm Water Management requirements of COGCC Rule 1002(f).

The purpose of this Form 2A is to request authorization and approval to relocate drill cuttings from the DOE 1-M-18 well pad and manage them for permanent disposal and stabilization. The Primary cuttings management area is on Federal surface (Naval Oil Shale Reserve) and is managed by BLM, whereas, the Secondary cuttings management area, the RWF 44-18 pad (COGCC Location ID 335146) is located on Fee surface (Clough Sheep Company). After consultation with all appropriate agencies and surface owners, all parties are in agreement that this is an acceptable and reasonable plan for safely managing the drill cuttings from the DOE 1-M-18 well pad.