



## Soil Sample Report – Walters-Calhoun Lease

Impetro Resources, LLC

March 13, 2019

Mr. Sam Bradley  
Impetro Resources, LLC  
2820 Logan Drive  
Loveland, Colorado 80538

Via E-Mail: [sbradley.impetro@gmail.com](mailto:sbradley.impetro@gmail.com)

Re: Soil Sample Report – Walter Calhoun Lease  
Impetro Resources, LLC  
COGCC Spill/Release Point ID: 460342

Mr. Bradley,

On February 28, 2019, CGRS mobilized to the Walter-Calhoun Lease, located in Washington County, Colorado, to collect soil samples per your request and in accordance with the conditions of approval (COA) listed in the supplemental spill/release report (COGCC Form 19), provided in Attachment A. Four (4) confirmation soil samples, and one (1) background soil sample were collected from the spill-affected area and were submitted to Origins Laboratory in Denver, Colorado for analysis of pH, electrical conductivity (EC), and sodium adsorption ratio (SAR). In conjunction with soil sample collection, soil samples were screened using a photo-ionization detector (PID). A summary of the PID readings is shown below:

Sample ID	PID Reading (ppm)
SS-1 (SE) @ 3"	0.0
SS-2 (SW) @3"	0.0
SS-3 (NW) @3"	0.1
SS-4 (NE) @3"	0.7
SS-5 (Background) @3"	0.0

Background soil conditions were established by collecting a sample from comparable, nearby non-impacted native soil (SS-5 (Background)) at 3 inches below ground surface (bgs) and having the sample analyzed for pH, electrical conductivity (EC), and sodium adsorption ratio (SAR).

Review of the analytical results for the four confirmation samples (SS-1 (SE) @3", SS-2 (SW) @3", SS-3 (NW) @3", and SS-4 (NE) @3") indicate that pH, electrical conductivity (EC), and sodium adsorption ratio (SAR) are within normal background levels when compared to the background soil sample and are not in exceedance of the levels listed in COGCC Table 910-1. Soil analytical results are illustrated in the attached Soil Sample Location Map. The laboratory reports and chain-of-custody documentation are included in Attachment B.

Based on laboratory analytical data of the soil samples, it appears that the impacts to soil have been adequately defined and abated. Should you have any questions or require any additional information, please feel free to contact me at [dkinnaird@cgrs.com](mailto:dkinnaird@cgrs.com).

Sincerely,  
CGRS, Inc.



Drezen Kinnaird  
Staff Environmental Scientist III

Reviewed by:

Elizabeth Wilson  
Staff Geologist III

Enclosures:

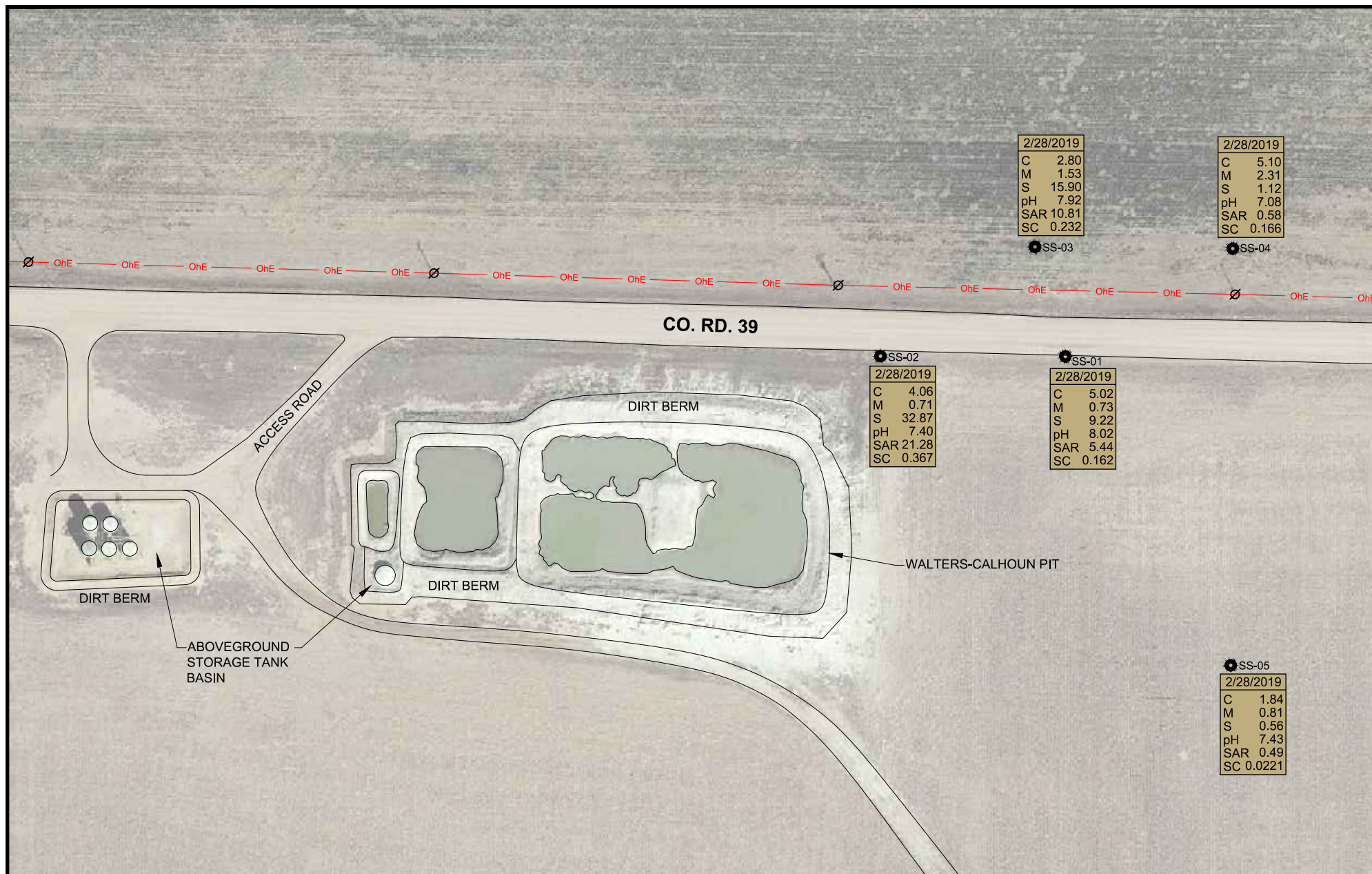
- Soil Sample Location Map
- Attachment A – Subsequent COGCC Form 19
- Attachment B – Laboratory Analytical Reports & Chain-of-Custody Documentation



## Figures

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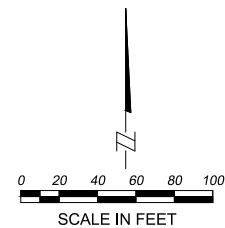
Soil Sample Location Map



#### LEGEND

- SS-01 SOIL SAMPLE LOCATION
- Ø UTILITY POLE
- OHE — OVERHEAD ELECTRIC

SAMPLE DATE	
C	CALCIUM (me/L)
M	MAGNESIUM (me/L)
S	SODIUM (me/L)
pH	pH (pH Units)
SAR	SAR by 20B SATURATED PASTE
SC	SPECIFIC CONDUCTANCE (mmhos/cm)



#### SOIL SAMPLE LOCATION MAP

IMPETRO RESOURCES, INC.  
WALTERS-CALHOUN PIT  
COGCC SPILL/RELEASE POINT ID: 460342  
NENW, S21, T2N, R49W  
OTIS, COLORADO

PROJECT:

1-14006-17728aa

DRAFT:

CLB

DATE:

3/12/2019

REVIEW:





## **Attachments**

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Laboratory Reports and Chain of Custody Documentation  
Supplemental Form 19 (COGCC)



March 06, 2019

CGRS, Inc

Drezden Kinnaird

1301 Academy Court

Fort Collins

CO 80524

**Project Name - Walters-Calhoun**

**Project Number - 17728aa**

Attached are your analytical results for Walters-Calhoun received by Origins Laboratory, Inc. March 01, 2019. This project is associated with Origins project number Y903009-01.

The analytical results in the following report were analyzed under the guidelines of EPA Methods. These methods are identified as follows; "SW" are defined in SW-846, "EPA" are defined in 40CFR part 136 and "SM" are defined in the most current revision of Standard Methods For the Examination of Water and Wastewater.

The analytical results apply specifically to the samples and analyses specified per the attached Chain of Custody. As such, this report shall not be reproduced except in full, without the written approval of Origin's laboratory.

Unless otherwise noted, the analytical results for all soil samples are reported on a wet weight basis. All analytical analyses were performed under NELAP guidelines unless noted by a data qualifier.

Any holding time exceedances, deviations from the method specifications or deviations from Origins Laboratory's Standard Operating Procedures are outlined in the case narrative.

Thank you for selecting Origins for your analytical needs. Please contact us with any questions concerning this report, or if we can help with anything at all.

Origins Laboratory, Inc.  
303.433.1322  
o-squad@oelabinc.com



1725 Elk Place, Denver, CO 80211 | Phone: 303.433.1322 | Fax: 303.265.9645

CGRS, Inc  
1301 Academy Court  
Fort Collins CO 80524

Drezden Kinnaird  
Project Number: 17728aa  
Project: Walters-Calhoun

### CROSS REFERENCE REPORT

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SS-1	Y903009-01	Soil	February 28, 2019 16:30	03/01/2019 09:21
SS-2	Y903009-02	Soil	February 28, 2019 16:50	03/01/2019 09:21
SS-3	Y903009-03	Soil	February 28, 2019 17:05	03/01/2019 09:21
SS-4	Y903009-04	Soil	February 28, 2019 17:15	03/01/2019 09:21
SS-5	Y903009-05	Soil	February 28, 2019 17:30	03/01/2019 09:21

Origins Laboratory, Inc.



*The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.*



CGRS, Inc  
1301 Academy Court  
Fort Collins CO 80524

Drezden Kinnaird  
Project Number: 17728aa  
Project: Walters-Calhoun

www.originslaboratory.com

ORIGINS  
LABORATORY, INC

1703009

page 1 of 1

Client: \_\_\_\_\_  
Address: \_\_\_\_\_  
Telephone Number: \_\_\_\_\_  
Email Address: dkinnaird@cgrs.com  
Project Manager: Drezden Kinnaird  
Project Name: WALTERS-CALHOUN  
Project Number: 17728aa  
Samples Collected By: EWJ

Sample ID Description	Date Sampled	Time Sampled	# of Containers	Preservative				Matrix			Analysis		Sample Instructions
				Unpreserved	HCl	HNO <sub>3</sub>	Other	Groundwater	Soil	Air Summa Canister #	Other		
SS-1	2/20/19	16:30	2					X			X	X	1
SS-2		16:50	1										2
SS-3		17:05	1										3
SS-4		17:15	1										4
SS-5		17:30	1										5
													6
													7
													8
													9
													10

Relinquished By:	Date:	Time:	Received By:	Date:	Time:	Turnaround Time:
<u>Steve Warner</u>	3-1-19	9:21	<u>[Signature]</u>	3-1-19	9:21	Same Day <input type="checkbox"/> 24 Hr <input type="checkbox"/>
Relinquished By:	Date:	Time:	Received By:	Date:	Time:	48 Hr <input type="checkbox"/> 72 Hr <input type="checkbox"/> Standard <input checked="" type="checkbox"/>

Date Results Needed

3.6

Temp Received-

Origins Laboratory, Inc.

*Jefe Pellegrini*

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CGRS, Inc  
1301 Academy Court  
Fort Collins CO 80524

Drezden Kinnaird  
Project Number: 17728aa  
Project: Walters-Calhoun

Origins Laboratory

F-012207-01-R1  
Effective Date: 01/09/12

## Sample Receipt Checklist

Origins Work Order: Y903009

Client: CGRS Inc.

Client Project ID: Walters-Calhoun

Checklist Completed by: JG

Shipped Via: HD

(UPS, FedEx, Hand Delivered, Pick-up, etc.)

Date/time completed: 3 / 1 / 2019

Airbill #: N/A

Matrix(s) Received: (Check all that apply): ☒ Soil/Solid ☐ Water ☐ Other: \_\_\_\_\_

Cooler Number/Temperature: 1 / 3.6 °C \_\_\_\_\_ / \_\_\_\_\_ °C \_\_\_\_\_ / \_\_\_\_\_ °C (Describe)

Thermometer ID: T003

Requirement Description	Yes	No	N/A	Comments (if any)
If samples require cooling, was the temperature between 0°C to ≤ 6°C <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is there ice present (document if blue ice is used)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are custody seals present on cooler? (if so, document in comments if they are signed and dated, broken or intact)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are custody seals present on each sample container? (if so, document in comments if they are signed and dated, broken or intact)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Were all samples received intact <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Was adequate sample volume provided <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are short holding time analytes or samples with HTs due within 48 hours present <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Is a chain-of-custody (COC) present and filled out completely <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does the COC agree with the number and type of sample bottles received <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do the sample IDs on the bottle labels match the COC <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the COC properly relinquished by the client with date and time recorded <sup>(1)</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For volatiles in water – is there headspace (> ¼ inch bubble) present? If yes, contact client and note in narrative.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Are samples preserved that require preservation and was it checked <sup>(1)</sup> ? (note ID of confirmation instrument used in comments) / (preservation is not confirmed for subcontracted analyses in order to insure sample integrity)/(pH <2 for samples preserved with HNO <sub>3</sub> , HCL, H <sub>2</sub> SO <sub>4</sub> ) / (pH >10 for samples preserved with NaAsO <sub>2</sub> +NaOH, ZnAc+NaOH)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Additional Comments (if any):				

<sup>(1)</sup>If NO, then contact the client before proceeding with analysis and note date/time and person contacted as well as the corrective action to in the additional comments (above) and the case narrative.

Reviewed by (Project Manager) [Signature]

Date/Time Reviewed 3/4/19

Origins Laboratory, Inc.

Jefe Pellegrini

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CGRS, Inc  
1301 Academy Court  
Fort Collins CO 80524

Drezden Kinnaird  
Project Number: 17728aa  
Project: Walters-Calhoun

**SS-1****2/28/2019 4:30:00PM**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Notes
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**AAL, Inc.**  
**Y903009-01 (Soil)****Metals (Saturated Paste Prep)**

Calcium	5.02	me/L	1		'[none]'		03/04/2019	03/06/2019	
Magnesium	0.73	"	"		"		"	"	
Sodium	9.22	"	"		"		"	"	

**pH in Soil by EPA 9045D**

pH	8.02	pH Units	1		B9C0503	OLAB	03/05/2019	03/05/2019	
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**SAR by 20B Saturated Paste**

SAR	5.44		1		'[none]'		03/04/2019	03/06/2019	
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**Specific Conductance by Modified 9050A**

Specific Conductance (EC)	0.162	0.00500	mmhos/cm	1	B9C0504	OLAB	03/05/2019	03/05/2019	
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1301 Academy Court  
Fort Collins CO 80524

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Project Number: 17728aa  
Project: Walters-Calhoun

**SS-2****2/28/2019 4:50:00PM**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Notes
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**AAL, Inc.**  
**Y903009-02 (Soil)****Metals (Saturated Paste Prep)**

Calcium	4.06	me/L	1		'[none]'		03/04/2019	03/06/2019	
Magnesium	0.71	"	"		"		"	"	
Sodium	32.87	"	"		"		"	"	

**pH in Soil by EPA 9045D**

pH	7.40	pH Units	1		B9C0503	KDK	03/05/2019	03/05/2019	
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**SAR by 20B Saturated Paste**

SAR	21.28		1		'[none]'		03/04/2019	03/06/2019	
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**Specific Conductance by Modified 9050A**

Specific Conductance (EC)	0.367	0.00500	mmhos/cm	1	B9C0504	KDK	03/05/2019	03/05/2019	
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Fort Collins CO 80524

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Project Number: 17728aa  
Project: Walters-Calhoun

**SS-3****2/28/2019 5:05:00PM**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Notes
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**AAL, Inc.**  
**Y903009-03 (Soil)****Metals (Saturated Paste Prep)**

Calcium	2.80	me/L	1		'[none]'		03/04/2019	03/06/2019	
Magnesium	1.53	"	"		"		"	"	
Sodium	15.90	"	"		"		"	"	

**pH in Soil by EPA 9045D**

pH	7.92	pH Units	1		B9C0503	KDK	03/05/2019	03/05/2019	
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**SAR by 20B Saturated Paste**

SAR	10.81		1		'[none]'		03/04/2019	03/06/2019	
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**Specific Conductance by Modified 9050A**

Specific Conductance (EC)	0.232	0.00505	mmhos/cm	1	B9C0504	KDK	03/05/2019	03/05/2019	
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CGRS, Inc  
1301 Academy Court  
Fort Collins CO 80524

Drezden Kinnaird  
Project Number: 17728aa  
Project: Walters-Calhoun

## SS-4

2/28/2019 5:15:00PM

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Notes
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## AAL, Inc. Y903009-04 (Soil)

### Metals (Saturated Paste Prep)

Calcium	5.10	me/L	1		'[none]'		03/04/2019	03/06/2019	
Magnesium	2.31	"	"		"		"	"	
Sodium	1.12	"	"		"		"	"	

### pH in Soil by EPA 9045D

pH	7.08	pH Units	1		B9C0503	KDK	03/05/2019	03/05/2019	
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### SAR by 20B Saturated Paste

SAR	0.58		1		'[none]'		03/04/2019	03/06/2019	
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### Specific Conductance by Modified 9050A

Specific Conductance (EC)	0.166	0.00500	mmhos/cm	1	B9C0504	KDK	03/05/2019	03/05/2019	
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1301 Academy Court  
Fort Collins CO 80524

Drezden Kinnaird  
Project Number: 17728aa  
Project: Walters-Calhoun

**SS-5****2/28/2019 5:30:00PM**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Notes
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**AAL, Inc.**  
**Y903009-05 (Soil)****Metals (Saturated Paste Prep)**

Calcium	1.84		me/L	1	'[none]'		03/04/2019	03/06/2019	
Magnesium	0.81		"	"	"		"	"	
Sodium	0.56		"	"	"		"	"	

**pH in Soil by EPA 9045D**

pH	7.43		pH Units	1	B9C0503	KDK	03/05/2019	03/05/2019	
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**SAR by 20B Saturated Paste**

SAR	0.49			1	'[none]'		03/04/2019	03/06/2019	
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**Specific Conductance by Modified 9050A**

Specific Conductance (EC)	0.0221	0.00508	mmhos/cm	1	B9C0504	KDK	03/05/2019	03/05/2019	
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Origins Laboratory, Inc.



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Fort Collins CO 80524

Drezden Kinnaird  
Project Number: 17728aa  
Project: Walters-Calhoun

**Classical Chemistry Parameters - Quality Control**  
**Origins Laboratory, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch B9C0503 - NO PREP</b>										
<b>Duplicate (B9C0503-DUP1)</b>		<b>Source: Y903009-01</b>			Prepared: 03/05/2019 Analyzed: 03/05/2019					
pH	7.11		pH Units		8.02			12.0	25	
<b>Batch B9C0504 - NO PREP</b>										
<b>Blank (B9C0504-BLK1)</b>		Prepared: 03/05/2019 Analyzed: 03/05/2019								
Specific Conductance (EC)	0.00230	0.00500	mmhos/cm							
<b>Duplicate (B9C0504-DUP1)</b>		<b>Source: Y903009-01</b>			Prepared: 03/05/2019 Analyzed: 03/05/2019					
Specific Conductance (EC)	0.150	0.00508	mmhos/cm		0.162			7.77	25	

Origins Laboratory, Inc.



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CGRS, Inc

1301 Academy Court

Fort Collins CO 80524

Drezden Kinnaird

Project Number: 17728aa

Project: Walters-Calhoun

### Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

All soil results are reported at a wet weight basis.

Origins Laboratory, Inc.



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Jen Pellegrini For Noelle Doyle Mathis, President

State of Colorado  
Oil and Gas Conservation Commission

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



Document Number:

401916252

Date Received:

01/24/2019

Spill report taken by:

YOUNG, ROB

Spill/Release Point ID:

460342

## SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 906.b. for reporting requirements of spills or releases of E&P Waste or produced fluids. Submit a Site Investigation and Remediation Workplan (Form 27) when requested by the Director.

### OPERATOR INFORMATION

Name of Operator: <u>IMPETRO RESOURCES LLC</u>	Operator No: <u>10690</u>	<b>Phone Numbers</b>
Address: <u>2820 LOGAN DRIVE</u>		Phone: <u>(970) 593-8626</u>
City: <u>LOVELAND</u>	State: <u>CO</u>	Mobile: <u>(970) 593-8626</u>
Zip: <u>80538</u>		Email: <u>sbradley.impetro@gmail.com</u>
Contact Person: <u>Sam Bradley</u>		

### INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 401883642

Initial Report Date: 12/20/2018 Date of Discovery: 12/14/2018 Spill Type: Recent Spill

#### Spill/Release Point Location:

Location of Spill/Release: QTRQTR NENW SEC 21 TWP 2N RNG 49W MERIDIAN 6

Latitude: 40.133580 Longitude: -102.863580

Municipality (if within municipal boundaries): \_\_\_\_\_ County: WASHINGTON

#### Reference Location:

Facility Type: PIT ☒ Facility/Location ID No 117634

Spill/Release Point Name: Walters Pit ☐ No Existing Facility or Location ID No.

Number: \_\_\_\_\_ ☐ Well API No. (Only if the reference facility is well) 05- -

#### Fluid(s) Spilled/Released (please answer Yes/No):

Was one (1) barrel or more spilled outside of berms or secondary containment? Yes

*Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.*

Were Five (5) barrels or more spilled? Yes

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): 0

Estimated Condensate Spill Volume(bbl): 0

Estimated Flow Back Fluid Spill Volume(bbl): 0

Estimated Produced Water Spill Volume(bbl): >=100

Estimated Other E&P Waste Spill Volume(bbl): 0

Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: 200 BBL OF PRODUCED WATER ~1,000 TDS

#### Land Use:

Current Land Use: CROP LAND Other(Specify): \_\_\_\_\_

Weather Condition: WINDY

Surface Owner: FEE Other(Specify): Gail McCauley

#### Check if impacted or threatened by spill/Release (please answer Yes/No to all that apply):

Waters of the State ☐ Residence/Occupied Structure ☐ Livestock ☐ Public Byway ☒ Surface Water Supply Area ☐

*As defined in COGCC 100-Series Rules*

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

On 12/19/18 at 15:45 the local farmer called the Impetro Resources LLC 24 hour phone number posted on the sign at the Walters tank battery and informed that the produced water pit was over flowing on the East side due to large waves and was beginning to wash out. Sam called the lease operator to shut the flow to the pit off. The lease operator arrived on location and shut off flow to the pit at 16:30. Sam arrived on location with a construction crew at 18:00 and observed a 6" wide and 1' deep wash at the top of the East pit wall. At 18:00 freeboard was approximately 1' with the wind blowing waves against the East wall. A water flow 6" wide and 1" deep was flowing across the pit wall and down into the bar ditch and across WCR 39. Concrete sacks and sand bags were used to stop the flow and secure the pit wall for the night. On 12/20/2018 a water truck was used to suck up 180 bbl of water from under ice along the bar ditch and the pit wall was repaired with a back-hoe.

**List Agencies and Other Parties Notified:**

**OTHER NOTIFICATIONS**

Date	Agency/Party	Contact	Phone	Response
12/20/2018	Surface Owner	Gail McCauley	970-630-5201	Voicemail - No Return Call
12/20/2018	COGCC	Susan Sherman	719-775-1111	Onsite inspection
12/20/2018	LGD	Larry Griese	970-345-6662	Phone Discussion
12/20/2018	COGCC	Rob Young	720-471-1304	Phone Discussion

Was there a Grade 1 Gas Leak associated with this E & P waste spill or release? Yes ☐ No ☒

If YES, enter the Document Number of the Initial Grade 1 Gas Leak Report Form 44: \_\_\_\_\_

Was there a reportable accident associated with this E & P waste spill or release? Yes ☐ No ☒

If YES, enter the Document Number of the Initial Accident Report, Form 22: \_\_\_\_\_

**REQUEST FOR CLOSURE**

**Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.**

Basis for Closure: ☐ Corrective Actions Completed (documentation attached)

☐ Work proceeding under an approved Form 27

Form 27 Remediation Project No: \_\_\_\_\_

**OPERATOR COMMENTS:**

Please see attached water analysis. The sample was taken from the discharge into the pit that caused the release.

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

Signed: \_\_\_\_\_ Print Name: Sam Bradley

Title: Managing Member Date: 01/24/2019 Email: sbradley.impetro@gmail.com

**COA Type**

**Description**

	Collect four soil samples from the spill affected area for laboratory analysis of pH, EC and SAR. Two samples should be from south of the county road and two from the north side of the road. A background sample should be collected for comparison with Table 910-1. Include a soil sample location drawing with the analytical results on a supplemental eForm 19.
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**Attachment Check List**

Att Doc Num	Name
401916252	SPILL/RELEASE REPORT(SUPPLEMENTAL)
401916256	ANALYTICAL RESULTS
401920718	FORM 19 SUBMITTED

Total Attach: 3 Files

**General Comments**

<u><b>User Group</b></u>	<u><b>Comment</b></u>	<u><b>Comment Date</b></u>
		Stamp Upon Approval

Total: 0 comment(s)