
WASTE MANAGEMENT PLAN

BNL | ENTERPRISE

Enterprise State 16-1 (2962)

Sec. 16 T29S R62W (NE/4 SE/4)

Las Animas County, Colorado

Surface: State

Submitted as an accompaniment to the Form 2A Application
And consistent with the requirements of Rule 905.a.(4).

Original Submittal: April 14, 2021

Revised: June 30, 2021

BNL (Enterprise) Inc. Las Animas County, Colorado

Comprehensive Waste Management Plan

Pursuant to compliance with the Colorado Oil and Gas (COGCC) 905 Rule Series, BNL (Enterprise), Inc. ("Enterprise"), plan outlines the general guidelines for handling and disposal of all Exploration and Production (E&P) Waste, including drilling cuttings, drill fluids, produced fluids and pits. Enterprise will adhere to all stipulations under COGCC 905 Rule Series to ensure E&P Waste is properly stored, handled, transported, treated, recycled, or disposed to prevent threatened or actual adverse environmental impacts to air, water, soil, or biological resources, or to the extent necessary to ensure compliance with the concentration levels in Table 915-1, radiation control standards, and WQCC Regulation 41 numeric and narrative Groundwater quality standards and classifications, as incorporated by reference in Rule 901.b.

E&P waste onsite will be stored in compatible containers or containment devices designed or engineered for the purposes for which they will be utilized. These containers will be inspected on a regular basis to ensure that no undue wear, structural issues, severe rust, or other defects will impact their effectiveness.

Enterprise will only transport E&P waste off-site within Colorado to facilities authorized by the Director, to permitted commercial waste disposal facilities, permitted commercial waste recycling facilities, or beneficial use sites approved to receive E&P waste by the Colorado Department of Public Health and Environment (CDPHE) and the relevant local government.

Enterprise has no plans to transport any E&P waste out of Colorado. However, if necessary, Enterprise will transport E&P waste off-site for treatment or waste disposal outside of Colorado only to facilities authorized and permitted by the appropriate regulatory agency in the receiving state. Enterprise will comply with the Rocky Mountain Low-level Radioactive Waste Board's Rules, as incorporated by reference in Rule 901.b.

Enterprise will maintain, for not less than 5 years, copies of each invoice, bill, or ticket, and such other records as necessary to document the requirements listed in Rules 905.b.(3).A–F for all E&P waste generated by Enterprise that is transported off-site. Such records will be signed by the transporter and provided to the Director upon request.

Produced Water

Enterprise anticipates a low volume, if any, of produced water. Produced water will be stored in tanks onsite prior to transport to a commercial disposal facility.

Drilling Fluids

Enterprise will employ closed-loop drilling techniques. The drill cuttings will be mechanically separated from water-based bentonitic drilling fluids and placed in a 24-mil lined cuttings pit. Any drilling fluids not able to be re-used on alternate locations will be disposed of at a commercial solid waste disposal facility.

Enterprise may recycle drilling fluids for reuse at another location that is properly permitted and operated pursuant to Rules 908, 909, & 910.

Drill Cuttings

Enterprise will employ closed-loop drilling techniques. The drill cuttings will be mechanically separated from water-based bentonitic drilling fluids and placed in a 24-mil lined cuttings pit on location and will demonstrate compliance with Table 915-1 through sampling and analysis. The drill cuttings will comply with Table 915-1, will not be considered oily waste, and will be generated using water-based bentonitic drilling fluids. Cuttings pit contents will be tested to the concentration levels in Table 915-1. Prior to burial, Enterprise will remove the liner, have surface owner approval for burial, along with Form 27 approval by the Director. If Enterprise does not have surface owner approval the cuttings will be trucked to an approved disposal facility as laid out below.

Anticipated volumes for drill cuttings will be less than 3,000 cubic feet.

Enterprise anticipates collecting four (4) samples, one from each corner of the pit. If additional locations appear to have any contamination or hydrocarbon present additional samples will be collected to ensure compliance of the cuttings before burial. If the cuttings do not meet the major headings for Table 915-1 criteria, the pit will be sourced for commercial disposal of the material based on tested contents. Enterprise is certain that cuttings of less than 3,000' will not be contaminated. If this is not the case, and depending on test results, Enterprise will contact the commercial disposal facilities to determine exactly what that individual disposal facility will allow. If needed, the cuttings will be remediated to lower levels of any contaminants. The pits will be retested, copies of any test results will be provided to the disposal facilities, and once approved will be trucked to the determined disposal facility.

Pit Closure

After all cuttings pit contents are sufficiently dry, the liner will be removed, and the pit will be backfilled. Materials removed from the pit for drying shall be returned to the pit prior to the backfilling. No more than *de minimis* amounts may be incorporated into the surface materials. The backfilling of the cuttings pit will be done to return the soils to their original relative positions so that pit contents will be confined to the pit and not squeezed out and incorporated in the surface materials. Closure and reclamation of cuttings pits shall occur no later than six (6) months after drilling and completion activities conclude, weather permitting.

General

Any soils contaminated by E&P waste will be disposed of at a licensed third-party solid waste disposal facility/landfill. Water tank bottoms will be disposed of at licensed third-party solid waste disposal facilities.

Liquid wastes such as produced water, if any, will be disposed of at licensed third-party injection facilities such as those run by NGL Water Solutions.

Commercial disposal facilities planned to be used for disposal of solids materials are:

North La Junta Sanitation
208 Seeley Street
La Junta CO 81050
East of CR109 & Seeley Street

Enterprise will keep records of all E & P waste that is transported off-site for a period of not less than five (5) years. These records will satisfy the requirements of COGCC. If requested, Enterprise will provide copies of these records to the COGCC.

Immediately upon discovering any spills or releases of E&P waste, produced fluids, or unauthorized releases of natural gas that meet the criteria of Rules 912.b.(1).H, I, or J, regardless of size or volume, Enterprise will control and contain any spill or release to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. Spills will be investigated, cleaned up, and the impacts will be documented as soon as the impacts are discovered.

For any Spills or Releases that do not meet the reporting requirements of Rule 912.b, Enterprise will document cleanup efforts and provide documentation of the cleanup to the Director upon request.

Waste Characterization

Waste	Identification Method	Assessment Method	Treatment	Transport	Disposal	Recycle
Drill Cuttings	Knowledge of Process	Sampling and Analysis	TBD by Table 915-1 analysis	Pit Burial after analysis and TBD remediation		No
Drilling Fluids	Knowledge of Process	Sampling and Analysis	TBD by Table 915-1 analysis	Dewatered Fluids Trucked if not recycled	North La Junta Sanitation	Yes - When Applicable
Cement Returns	Knowledge of Process	Knowledge of Process	None	Truck	North La Junta Sanitation	No
Frac Sand		Not applicable				
E&P Exempt Liquids						
Produced Water	Knowledge of Process	Sampling and Analysis	TBD by Table 915-1 analysis	Truck	North La Junta Sanitation	When Applicable
Impacted Soil	Visual Determination	Sampling and Analysis	If any: TBD by Table 915-1 analysis	Truck	North La Junta Sanitation	No