

It is suggested that Lone Pine Gas, Inc., retain the services of a qualified individual or entity, specifically experienced in environmental cleanup and compliance to develop a Site Investigation and Remediation Work Plan (Form 27), Immediately begin to initiate cleanup of hydrocarbons along Ponds 4 and 5 (see Attachment 1) and along the outfall discharge to Spring Gulch. Collect surface water samples from Spring Gulch Creek at locations up gradient of where drainage discharges into the Creek, at the approximate point of discharge, and down gradient of the approximate point of discharge. Remediate and collect soil samples along the flow path in the drainage where visible oil staining was observed. Collect water samples from Ponds (1, 2, 3, 4, 5) and the Holding Pond.

Water samples from the Ponds, soil samples, surface water samples (Spring Gulch Creek) and are to be analyzed for:

- Anions (Cl, BR, NO₂, NO₃, o-Phosphate, SO₄)
- Dissolved Metals (Ca, Fe, Mg, Mn, K, Na)
- Dissolved Metals (Se)
- Fluoride
- Alkalinity Series (Carbonate, Bicarbonate, Hydroxide, and Total Alkalinity)
- Total Dissolved Solids
- Specific Conductance
- Ph,
- SAR
- EC
- Benzene, Toluene, Ethylbenzene, and Xylenes (total)
- Total petroleum hydrocarbons (DRO and GRO)

Remove accumulation of oil from all pits and ponds, provide proper fencing and netting around all pits and ponds. All materials removed shall NOT be landfarmed on site, but disposed of an approved facility. Haul tickets will be required to be provided to the COGCC.

Immediately cease using the pit identified as “Holding Pond.” This pit has a compromised liner with excess gas is being vented into the pit, the pit contains oil and water, the pit is not netted.

Either close or properly permit the Holding Pond as a “Special Purpose Pit.” There appeared to be E & P material along the sides of the pit.

As part of the Form 27 shall address a subsurface site investigation to determine groundwater conditions in the vicinity of the Holding Pond, Pond 1, Pond 2, and Pond 3 and hydraulic connectively between the ponds. Lone Pine Gas, Inc. staff stated they do not know the source of the water in the Holding Pond. Attempts have been made to draw down Holding Pond, but is recharging from an unknown source. A timeline shall be provided for completing activities of the subsurface site investigation.

Provide “as-built” process flow diagram of the Lone Pine Gas, Inc. Processing Plant. It is suggested that all flow lines should be labeled as gas, water, oil and the direction of flow.

Mechanically remove from service and cap flow lines, from the three (3) 400 bbl out of service tanks that are located within the tank battery. These tanks are currently plumbed.