

From: [Matt Lepore - DNR](#)
To: [Parce, Doug](#); Michael.Gardner@wpxenergy.com
Cc: [Chris Canfield - DNR](#); [David Andrews - DNR](#); [James Milne - DNR](#); Nguyen.Tien@epa.gov; [Hill, Laura](#); [Merrick, Stewart](#); [Keylor, Dave](#)
Bcc: [Matt Lepore - DNR](#)
Subject: RE: Additional work plan in lieu of COGCC Form 27
Date: Thursday, March 21, 2013 8:01:12 PM

Doug:

The workplan for excavation of the area from the block valve set down-gradient to the interceptor trench is approved as part of Williams' continuing response actions to identify the source of hydrocarbon impacts to groundwater in the vicinity of the Parachute Gas Plant. I am approving this workplan in the absence of a Form 27 as part of Williams' on-going actions under the COGCC Cease and Desist Order issued on March 15, 2013.

Sincerely,

Matthew Lepore
Director
Colorado Oil and Gas Conservation Commission

From: Parce, Doug [mailto:Doug.Parce@williams.com]
Sent: Thursday, March 21, 2013 2:35 PM
To: Matt.Lepore@state.co.us; Michael.Gardner@WPXEnergy.com
Cc: Chris.Canfield@state.co.us; David.Andrews@state.co.us; James.Milne@state.co.us; Nguyen.Tien@epa.gov; Hill, Laura; Merrick, Stewart; Keylor, Dave
Subject: RE: Additional work plan in lieu of COGCC Form 27
Importance: High

Matt / Mike-

Here is the work plan for the excavation work that Williams and WPX have agreed to for the portion of the ROW on the 30" pipeline extending from the NGL valve set toward the Parachute Creek. From our discussions with WPX we are providing this to COGCC for approval as Williams' work plan for this effort which will allow assessment of the 30" line to continue uninterrupted from the current investigation work which is going on up-gradient of the valve set under a previously approved work plan. Please advise.

Thanks. -Doug.

In response to the release discovered along Williams' ROW and on property owned by WPX, WPX and Williams will follow the following work plan for excavation work to be done in an area from the block valve set down-gradient to the interceptor trench.

- **Using a hand-auger, shovel or other manual excavation techniques; Williams and WPX**

will collect split-samples at mutually agreed upon locations and sample depth increments (anticipated to be 6" depth intervals) in the area which was enclosed by the valve guard; and extending from the point where the upstream NGL pipe comes out of the ground to the point that the NGL pipe goes back into the ground downstream; particularly directly below and in the area adjacent to Williams' 4" NGL pipeline valve set. As deemed appropriate, Williams' and WPX's environmental consultants will collect and/or field screen the samples with a PID. Any samples collected will be split, so that both parties may submit them for analysis. As appropriate the environmental consultants should log into their field log books a description of the soil type, texture, odor, approximated saturation/soil moisture content, or any other observations of color or staining in the area; or other observable characteristics.

- Following field screening or soil sampling at a datum (beginning with grade level), mechanical excavation will be used to remove a layer of soil. WPX and Williams agree that this work will be in increments of 1 foot in depth.
- During all periods where mechanical excavation is in progress only the minimum essential personnel needed for the excavation work will be allowed within a safety exclusion zone. Non-essential personnel will be required to leave the exclusion zone while the mechanical work is in progress.
- As soils are excavated, after they were field screened and/or sampled, the removed soils will be placed in a dump truck which will then take the soils to a lined containment area Williams has constructed to receive impacted soils removed in relation to this release event.

Doug Parce
The Williams Companies
1050 - 17th Street, Suite 1800
Denver, Colorado 80265
303-249-3265 cell
303-405-8128 direct
303-405-8135 fax
Doug.Parce@Williams.com