

Boyd Farms 32-28 - Duncan Oil, Inc.
E&P Waste Management Plan For
Water-Based Bentonitic Drilling Fluids & Associated Drill Cuttings

This E&P Waste Management Plan outlines the operational requirements for handling water - based bentonitic drilling fluids and associated drill cuttings to maintain compliance with COGCC 900 Series Rules. Only water-based bentonitic drilling fluids and associated drill cuttings will be directed into the onsite pit by Duncan Oil, Inc. (Duncan). Evaporation and burial of drilling fluids and drill cuttings will be tested prior to pit closure to ensure compliance with COGCC Table 910-1 that hydrocarbon concentrations do not exceed 10,000 ppm TPH.

1. Duncan Oil, Inc. is preparing a Surface Use Agreement and shall obtain written authorization from the surface owner to bury the drilling cuttings in the onsite pit.
2. The signed agreement shall state that only water-based bentonitic drilling fluids and associated drill cuttings generated by Duncan Oil will be applied at this site. No other E&P waste shall be deposited in this pit.
3. If required by COGCC – a pit liner will be installed prior to use and removed and disposed of at an approved commercial disposal facility prior to pit closure.
4. Drilling fluids are discharged into the reserve pit prior to drilling into the oil bearing reservoir. When encountering oil, the drilling fluids will be diverted to a separation system. From the Operator, fluids (including oil) and cuttings will be transferred to storage tanks. Small quantities of oil may inadvertently flow into the reserve pit while flow is being diverted to the separation system.
5. During drilling operations, on-site drilling personnel will monitor the pit fluid level on a 24-hour basis to ensure the minimum required 2 feet freeboard is maintained.
6. Pit cuttings will be left to evaporation & burial by mixing contents with the original pit stockpile. During drilling operations, to prevent overfilling, any excess amount of fluids will be disposed to an authorized local commercial facility, as well as any oil contaminated cuttings. Upon closure of pit, cuttings left in pit shall meet the standards listed in Table 910. If a synthetic pit liner was used it shall be removed and disposed per COGCC, Series 900 rules to an authorized local landfill.
7. The Site Investigation and Remediation Work Plan (Form 27) will be prepared and submitted to the COGCC along with cuttings test results prior to closure.

