

From: [Steven Arauza - DNR](#)
To: "Ed Ingve"
Cc: ["jbcrog@aol.com"](mailto:jbcrog@aol.com)
Subject: RE: Bird State Pit Closure (COGCC Remediation Project #9615)
Date: Thursday, September 08, 2016 3:06:00 PM
Attachments: [Pit \(10\).JPG](#)

Hi Ed (CC: J.B.),

In response to the explanation and pit tickets that you've provided to document work completed on the Bird-State Drilling Pit (facility ID #445045), as well as observations made during my 9/7/2016 Environmental Field Inspection (doc #681700223), [the COGCC approves a one-time extension of the August 31, 2016 deadline for pit closure to November 1, 2016.](#)

Per our phone conversation this morning, the material that was observed being transported off-site from the SE corner of the drilling pit (photo attached) will need to be sampled and analyzed for pH, EC, SAR, TPH (DRO/GRO), and BTEX. Submit analytical results along with a diagram of the sample location as a supplemental report to Remediation Project #9615.

Additionally, Rule 907.d.(3) allows land application for beneficial reuse *provided* that written authorization is granted by the surface owner. Please provide written authorization for the land application of material that was excavated from the drilling pit.

Field Inspection Report #681700223 provides a corrective action date of [October 9, 2016](#) for the information requested above.

Thank you,
Steven J. Arauza, P.G.

From: Ed Ingve [<mailto:ed@renegadeoilandgas.com>]
Sent: Wednesday, September 07, 2016 10:32 AM
To: 'Steven Arauza - DNR'
Cc: 'JB Condill'
Subject: RE: Bird State Pit Closure (COGCC Remediation Project #9615)

Hey Steve,

Per your request within a phone conversation I would like to give you a written update about the Bird State pit closure. First I would like to apologize with regards to the update as I incorrectly remembered the drop dead date being the end of September and not the end of August. That is entirely my fault.

That being said the pit remains unclosed but has been remediated. All fluids and solid contents in the pit have been removed and dug out with margins that should give the pit a clean bill of health for closure. We are currently working on the well with a small day work drilling rig in an attempt to fish a dropped drill bit. If and when successful Renegade will need a workover reserve pit when setting a deep string of surface casing for mud returns. Additional BMP's have been performed to

the pit per the previous inspection. It is therefore requested that the pit remain in place until the final outcome of the Bird State 32-1 is determined. If you recall the original Form 27 requested a closure deadline of November. It is Renegade's desire to reclaim the original drill pit as soon as possible.

If a pit extension cannot be granted Renegade would like to know if a temporary workover pit request can be made for the existing pit. I don't know if that would allow the original drilling pit paperwork to be closed out and the pit could then be reclassified under workover pit rules.

Renegade appreciates the COGCC working with us to resolve this situation in an amicable way for these unusual circumstances. I'm sure the rules never contemplated the history of a project like the Bird State 32-1. I have attached several invoices regarding the work that has been performed over the last several months.

Thanks, Ed

Renegade Oil and Gas Company
ed@renegadeoilandgas.com
303-829-2354

From: Steven Arauza - DNR [<mailto:steven.arauza@state.co.us>]
Sent: Thursday, September 01, 2016 8:29 AM
To: Ed Ingve
Subject: Bird State Pit Closure (COGCC Remediation Project #9615)

Good morning, Mr. Ingve

This message is intended as a reminder that the Corrective Action due date for Remediation Project #9615 (pit closure at the Bird-State #32-1) passed yesterday, August 31, 2016. The Conditional Approval Letter dated April 18, 2016, COGCC Doc #1727423—attached, required work to be completed by the Corrective Action due date.

What is the status of the pit closure?

Steven J. Arauza, P.G.
Environmental Protection Specialist I



COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

P 303.894.2100 x5136 | C 720.498.5298 | F 303.894.2109
1120 Lincoln Street, Suite 801, Denver, CO 80203
steven.arauza@state.co.us | www.colorado.gov/cogcc



09.07.2016