12/09/2016 - A27 Release: Response to COAs Assigned to Sundry Notice # 401137723
(Form 19 – Spill/Release Point: 446199)
(Form 19 Document Number: 401064094 and Form 19 Supplemental: 401068217)
(Form 27: Remediation Number: 9748)

Hunter Ridge Energy Services, LLC (HRES) submitted a Supplemental Site Assessment report addressing investigation and remediation activities performed to date as well as a detailed schedule of next steps on 10/26/2016, in response to NOAV # 401105510. COGCC approved the Sundry Notice and Supplemental Site Assessment Report on 11/30/2016, with conditions. Those conditions of approval (COAs) and the HRES responses are provided below.

---

1. Agency Comment Date: 11/30/2016 - Points 7 and 8 of the Project Schedule (last page of the Supplemental Site Assessment) indicate that the Groundwater Remedial Plan will be submitted in June, 2017. June 2017 should be the date (at the latest) to start implementing a GW Remediation Plan (between source and springs). Please submit the Groundwater Remediation Plan by early May, so that implementation can start by the end of May. COGCC understands that updates and modifications to the Remediation Plan may be necessary as work progresses and new information is available.

HRES Response: The Project Schedule has been modified and the Groundwater Remedial Plan will be submitted by May 1st, 2017. The revised Project Schedule is attached.

---

2. Agency Comment Date: 10/31/2016 - It is stated that "The goal of the pilot test will be to confirm oil production characteristics of selected monitoring wells...." What is meant by this statement?

HRES Response: It has been our experience that yields of floating free product into collection wells may vary due to often subtle differences in hydrogeology, the actual thickness and lateral continuity of oil in the vicinity of the well and how the oil is extracted from the well. In general, the most important oil production characteristics are the rate at which oil may be removed from a given well using a given technology, the degree to which the product thickness is reduced in consideration of the rate of extraction and the degree to which oil returns to the well upon cessation of extraction.

---

3. Agency Comment Date: 10/31/2016 - It is stated that "A Work Plan will be prepared in late October to describe methods for performing pilot tests for oil recovery. Within 15-days of approval of this Sundry provide a Work Plan.

HRES Response: A Work Plan for an Oil Recovery Pilot Study was prepared by Hull and Associates on 10/28/2016. Oil recovery pilot tests were completed 11/04/2016. The Oil Recovery Pilot Study Work Plan is attached. The findings from the Oil Recovery Pilot Study will be discussed in the Phase 3 Assessment Report due for submission to COGCC on December 14, 2016.

---

4. Agency Comment Date: 10/31/2016 - Provide to the COGCC a brief weekly status of progress in the plan approvals from the Local Governments.

HRES Response: The pipeline grading permits associated with the alternative condensate recovery and water collection system, were submitted to Rio Blanco and Garfield Counties on 11/03/2016. Rio Blanco County approved the permit on 11/08/2016 and Garfield County approved the permit on 11/07/2016.

---

5. Agency Comment Date: 10/31/2016 - It is stated that "Construction of the alternative system will commence following completion of landowner negotiations and receipt of grading plan approvals from Garfield and Rio Blanco Counties. It is anticipated that the system will operate continually until it is determined that water quality at the spring meets state standards." Within 15-days of approval of this Sundry provide a schedule of when the alternative system will be operations.

HRES Response: HRES is in the process of installing the alternative recovery system. The project schedule will continue to be influenced by weather with the objective to have construction complete by the end of December 2016 and the system operational by mid-January 2017.

Attachments:

1. A27 Project Schedule
2. A27 Work Plan for an Oil Recovery Pilot Study