

From: [Ed Ingve](#)
To: "Steven Arauza - DNR"
Cc: "JB Condill"
Subject: RE: Bird State Drilling Pit (remediation project #9615)
Date: Friday, February 17, 2017 7:37:18 AM
Attachments: [SGS Accutest e-Hardcopy 2.0 Report D90141 Bird State 32-1 Pit sampled o... \(354 KB\).msg](#)
[Bird State Follow Up Soil Analysis.pdf](#)
[Bird State Soil Manifests.pdf](#)

Steven,

Please find attached both the soil sample analysis and disposal manifests for the above remediation project. I also included the email from JB Condill from Accutest as it has the summary results for the sample (a little easier to decipher).

I will also file a FIRR in response your inspection of the lease from 1/20/2017 and submitted 2/1/2017 (inspection number 401199876).

I think we are close to finishing and closing this drill pit remediation situation.

Any questions please feel free to call.

Ed

From: Steven Arauza - DNR [mailto:steven.arauza@state.co.us]
Sent: Wednesday, January 18, 2017 9:34 AM
To: Ed Ingve
Cc: jbcrog@aol.com
Subject: RE: Bird State Drilling Pit (remediation project #9615)

Thank you for the update, Ed.

Has the reclaimed mud adjacent to the pit been scraped and properly disposed of, per John's email? If so, please submit waste disposal documentation.

What is the status of the soil stock pile that had been documented in the 11/15/2016 Field Inspection Report (doc #673714408)?

-Steve

From: Ed Ingve [mailto:ed@renegadeoilandgas.com]
Sent: Thursday, January 12, 2017 5:34 PM
To: 'Steven Arauza - DNR'
Cc: 'JB Condill'
Subject: RE: Bird State Drilling Pit (remediation project #9615)

Steven,

Sorry for the delayed response. The workover is still on going. The pit remediation has been

complete but the final soil sample from our lab are not in yet and are overdue. Your email has prompted me to investigate where our results are. Once received the pit paperwork can be filed. Was hoping to completely wrap the pit part of this prior to responding.

Thanks, Ed

From: Steven Arauza - DNR [<mailto:steven.arauza@state.co.us>]
Sent: Thursday, January 12, 2017 11:21 AM
To: Ed Ingve
Cc: jbcrog@aol.com
Subject: RE: Bird State Drilling Pit (remediation project #9615)

Good morning Ed and JB,

I haven't heard any response to my inquiry from last month. What is the status of remediation and workover operations at the Bird-State facility?

From: Steven Arauza - DNR [<mailto:steven.arauza@state.co.us>]
Sent: Monday, December 12, 2016 3:16 PM
To: 'Ed Ingve'
Cc: 'jbcrog@aol.com'
Subject: RE: Bird State Drilling Pit (remediation project #9615)

Good afternoon Ed and JB,

I am writing to inform you that I am back in the office and will serve as your COGCC contact for correspondence regarding Remediation #9615.

The November 3rd email from John Axelson (below) indicates COGCC approval to close the subject pit and provides additional sampling requirements for the subject site. John's email instructed Renegade to scrape and properly dispose of the material located adjacent to the pit and to collect confirmation samples of the underlying soil to document compliance with Table 910-1. **Has the impacted material (adjacent to the pit) been scraped and disposed of yet? If not, what is the anticipated timeframe for removal of that material and collection of confirmation samples?**

Additionally, John's email requires sampling of cuttings that had been reused on-site to be conducted after work is completed on the well. **What is the status of the work on the well? What is your anticipated timeframe for sampling the reused cuttings?**

A Field Inspection Report from 11/15/2016 (doc #673714408) suggests that the pit had been backfilled and closed by the date of that inspection. It also documents the presence of an unidentified soil stockpile near the entrance to the site, which had neither an underlying liner nor an earthen berm. **What is the status of the soil stockpile that had been observed during the 11/15/2016 Field Inspection? Did the stockpile consist of clean fill material or impacted waste?**

If you have any questions, feel free to give me a call.

Thanks,

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



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From: Axelson - DNR, John [<mailto:john.axelson@state.co.us>]
Sent: Thursday, November 03, 2016 2:42 PM
To: Ed Ingve
Cc: JB Condill; Steven Arauza - DNR; EnviroScan, OGCC
Subject: Re: Bird State Drilling Pit (remediation project #9615)

Ed,

Sorry for the slow reply - I told you I would send an email as follow up to our conversation last week.

Based on the sample results provided, Renegade has COGCC approval to close the subject pit.

Regarding the mud sample collected adjacent to the pit, TPH, pH, and SAR exceed the COGCC Table 910-1 standards. As a result, that material should be scraped up and properly disposed off site. To verify that remaining soils comply with Table 910-1, please collect one additional soil sample from the underlying material after the mud is removed. Sample in the same approximate location as the last sample. Analyze it for TPH, pH & SAR.

Regarding any cuttings that were incorporated on site that may have been used for pad construction, please collect a sufficient number of samples from the areas on the pad where the cuttings were used and analyze them for TPH - GRO & DRO, BTEX, SAR, pH & EC. You can wait to perform this sampling until you have completed the work on the well. Assuming the samples comply with Table 910-1 standards you can perform final site grading and interim reclamation. If the samples do not comply, then you will need to propose remediation to either remove/dispose the cuttings or treat on site. I would suggest dividing the pad into quadrants and collect 4 representative samples.

Regarding the request to get written permission from the surface owner Rule 907.d.(3). That rule is specific to land application of water based bentonitic fluids. Cuttings are often sampled and left in the drilling pit or incorporated on site as long as sampling demonstrates compliance with Table 910-1. That activity does not generally require written authorization from the surface owner, unless you have a specific requirement in your lease with the State Land Board to do that. As a result, COGCC will not require written authorization from the surface owner.

Regarding the pit report Form 15. I will try to get it pushed through the system with the information you provided. I will let you know if additional information will be required.

When you have finished the pit closure and additional sampling/analysis, please submit the following information with a reference to Rem #9615:

1. Disposal documentation for the mud removed from the location and disposed off site.
2. Sample location diagram depicting the location of all samples collected.
3. Lab reports for the analysis of the additional soil samples requested.
4. Site photos of the pit after closure and the area where the mud was removed.

If you have any questions, please give me a call. Thank you for your cooperation with these issues.

John E. Axelson, P.G.
East Environmental Supervisor



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Cc. Rem #9615 - Correspondence

On Tue, Oct 25, 2016 at 1:56 PM, Ed Ingve <ed@renegadeoilandgas.com> wrote:
Hey John,

I guess you have become the point person for this. If you could review the soil sample analysis attached and confirm that this drill pit is ok to close I will try to get this done by the end of the week.

Call me after you have had a chance to review.

Thanks,
Ed Ingve
Renegade Oil and Gas Company
ed@renegadeoilandgas.com
[303-829-2354](tel:303-829-2354)

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From: Steven Arauza - DNR <steven.arauza@state.co.us>
To: Ed Ingve <ed@renegadeoilandgas.com>, <jbcrog@aol.com>
Cc: John Axelson - DNR <john.axelson@state.co.us>
Date: Fri, 30 Sep 2016 12:58:30 -0600
Subject: RE: Bird State Pit Closure (COGCC Remediation Project #9615)
Good afternoon, Ed and J.B. (cc: John Axelson),

I am writing to inform you that I will be out of the office from October 3rd until December 12th. Since Inspection Report #681700223 and Remediation Project #9615 have corrective action due dates in that timeframe, please submit required materials and any related correspondence directly to John Axelson (john.axelson@state.co.us) from this point on.

Thank you,

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



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From: Steven Arauza - DNR [mailto:steven.arauza@state.co.us]
Sent: Thursday, September 08, 2016 3:06 PM
To: 'Ed Ingve'
Cc: 'jbcrog@aol.com'
Subject: RE: Bird State Pit Closure (COGCC Remediation Project #9615)

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
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[303-829-2354](tel: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



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