



STATE OF
COLORADO

EnviroScan - DNR, OGCC <dnr_ogcc.enviroscan@state.co.us>

Re: Bird State Drilling Pit (remediation project #9615)

1 message

Axelson - DNR, John <john.axelson@state.co.us>

Thu, Nov 3, 2016 at 2:41 PM

To: Ed Ingve <ed@renegadeoilandgas.com>

Cc: JB Condill <jbcrog@aol.com>, Steven Arauza - DNR <steven.arauza@state.co.us>, "EnviroScan, OGCC" <ogcc.enviroscan@state.co.us>

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

----- Forwarded message -----

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

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



