

**WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID AND HAZARDOUS WASTE DIVISION
VOLUNTARY REMEDIATION PROGRAM**

**REVIEW COMMENTS FOR
REMEDIAL INVESTIGATION WORK PLAN – FINAL DRAFT**

September 14, 2007
Windsor Energy Group, L.L.C.
Crosby 25-3 Natural Gas Well Release

1. **Cover Letter:** Discuss that the WDEQ requested that the final work plan only include information on site specific field activities which had been completed at the time that the final draft work plan was completed. Discuss that all subsequent field activities, including but not limited to, the installation of additional groundwater monitoring wells, additional hydrogeologic testing, additional groundwater sampling events with additional private water wells included, the installation of the air sparge/soil vapor extraction system (interim measures), and the installation of a carbon filter system on the King’s domestic water well will be included in future documents.
2. Section 1.2, **Site History** (pages 1-2): Include information on all current and historical wells located on the Crosby well pad including the following production information: geologic production zones, timeframes of production, and types of hydrocarbons. Revise the text to indicate that the well drilled by TP Production Company is to the northwest of the subject site, not the northeast.
3. Section 1.3, **Chronology of Release** (pages 2-4): Include any pertinent information on the drilling activities associated with the Crosby 25-3 well including specific intervals of lost circulation or abnormal pressures and how these issues were addressed. Include the proposed explanation of how the blowout occurred and at what depth(s) the release left the well bore and entered the surrounding formation. Include information on why Windsor believes that there are no longer any releases occurring from deeper oil and gas zones into the shallower aquifers.
4. Section 1.7, **Initial Hydrogeologic Testing** (pages 8-9): Include text at the end of this section to indicate that the data from the initial testing was used to make the field decision to install nested wells, and that the data and conclusions from the additional hydrogeologic testing will be included in the “Report of Investigation – Phase 2”.
5. Section 2.1, **Objectives** (page 10): In the last sentence of the last paragraph, include “Interim Measures Report” and “Report of Investigation – Phase 2” as a future deliverables.

6. Sections 3.1, 3.4, 3.7: If Windsor does not plan to conduct forensic analyses of soils, groundwater, or springs, remove these references from the work plan. If left in the work plan then clarify in each section that the WDEQ has not reviewed or approved any sampling and analysis plans for forensic evaluations.
7. Section 6.0, **Additional Analytical Testing Evaluation**, (page 28): Include a statement that due to the volume of MSD sheets (approximately 200), they are not included in the work plan, but are available upon request to any interested parties. The WDEQ requests that a set of MSD sheets are made available to the public at the central repository.
8. Appendix B: This table is confusing in terms of Units, Amt/Unit and Total Used on Site. Either clarify with text and an example or revise to clarify how much of each chemical was actually used in the drilling mud. Add a column with the chemical formula corresponding to each “content”.