Good Afternoon,

On May 3, 2017 Whiting Petroleum reported a Major Undesirable event that had occurred back on 3/28/2017 at the Razor Unit 271 facility in Weld county Colorado. It was estimated that 107bbls of oil was spilled and thus far only 12bbls have been recovered. The location of the spill is FEE surface. NESE Sec. 27 T10N R58W. Operator is currently working on recovery and clean up of spill site. Currently operator is observing potholes that were made to inspect for the presence of “free oil” and recovering it if present. The Operator is further making plans to move equipment and expose subsurface lines to remove any remaining subsurface impacts.

The operator is being issued a Notice of Incidents of Noncompliance for failure to properly notify the BLM in accordance with NTL 3-A. I am planning an on site undesirable event inspection tomorrow morning 5/10/17. Whiting has submitted copies of spill reports and documentation that was submitted to the Colorado Oil and Gas Conservation Commission. A report will be filed in accordance with NTL 3-A as well.

Please contact me if additional information is needed. I will send a follow up report once it is received.

--

Mark O. Lyon

Acting Colorado State Office I&E Specialist

Supervisory Petroleum Engineering Technician

Bureau of Land Management

Royal Gorge Field Office

Cell Phone: [Redacted]

Email: myon@blm.gov
On May 3, 2017 Whiting Petroleum reported a Major Undesirable event that had occurred back on 3/28/2017 at the Razor Unit 271 facility in Weld county Colorado. It was estimated that 107bbls of oil was spilled and thus far only 12bbls have been recovered. The location of the spill is FEE surface. NESE Sec. 27 T10N R58W, Operator is currently working on recovery and clean up of spill site. Currently operator is observing potholes that were made to inspect for the presence of “free oil” and recovering it if present. The Operator is further making plans to move equipment and expose subsurface lines to remove any remaining subsurface impacts.
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Please contact me if additional information is needed. I will send a follow up report once it is received.

--

Mark O. Lyon

Acting Colorado State Office I&E Specialist
Supervisory Petroleum Engineering Technician
Bureau of Land Management
Royal Gorge Field Office
Cell Phone: [Redacted]
Email: mlyon@blm.gov

Gregory Shoop <gshoop@blm.gov>
To: "Lyon, Mark" <mlyon@blm.gov>

Thanks, Mark.

Does this INC come with and automatic fine?

Sent from my iPhone
[Quoted text hidden]

Mark Lyon <mlyon@blm.gov>
To: Gregory Shoop <gshoop@blm.gov>

Mr. Shoop,

I have already left for today. I will confirm whether or not there is an assessment for this violation. I don't believe there is but I will let you know in the morning.

Respectfully,

Mark

Sent from my iPhone
[Quoted text hidden]

Lyon, Mark <mlyon@blm.gov>
To: Gregory Shoop <gshoop@blm.gov>

Mr. Shoop,

I have reviewed NTL 3-A as well as the new CFR's and do not see where any assessment would be do at this point.

[Quoted text hidden]

Shoop, Gregory <gshoop@blm.gov>
To: "Lyon, Mark" <mlyon@blm.gov>

Thanks, Mark.
(Sorry to hear that...seems to me that failing to report a major undesirable event ought to be more than a wrist slap. But that's a problem for another day.)

Greg Shoop
Associate State Director
Colorado State Office
(W) [redacted]
(M) [redacted]
gshoop@blm.gov

---

Sales, Sharon <ssales@blm.gov>
To: "Lyon, Mark" <mlyon@blm.gov>

Hi Mark,

How did the onsite inspection go? Is there anything you need from me?

Thank you, Sharon

---

Sharon A. Sales
Natural Resource Specialist
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street,
Cañon City, CO 81212
ssales@blm.gov

~ Office
~ Cell

Follow us on social media!
Royal Gorge Field Office
Final Report on Major Undesirable Event from Royal Gorge Field Office Reported 5/17/17

2 messages

Lyon, Mark <mlyon@blm.gov>  
To: Lonny Bagley <lbagley@blm.gov>, Kent Walter <kwalter@blm.gov>, Peter Cowan <pcowan@blm.gov>, Keith Berger <kberger@blm.gov>, Sharon Sales <ssales@blm.gov>, Timothy Spisak <tspisak@blm.gov>, "Wells, Steven" <swells@blm.gov>, Subijoy Dutta <sdutta@blm.gov>, Greg Noble <gnoble@blm.gov>, Barbara Sterling <bsterling@blm.gov>

Good Morning,

I received the final spill report for the above mentioned spill in Royal Gorge Field Office. An Undesirable Event inspection was done and is being entered into AFMSS.

If there are any questions or any additional information needed please let me know.

Also please see the below email from Kyle Waggoner with Whiting regarding their plan for clean-up.

Mr. Lyon,

Thank you for the call earlier today requesting further details regarding the Razor 271 remediation plan. Currently we have advanced 7'-8' below ground surface (BGS) potholes to delineate the extents of the subsurface impacts. We are monitoring each of the potholes daily and evacuating them of any product if present. The footprint of the release extends under surface tanks and production piping. To safely remediate the impacted underlying soils, we are currently planning on temporarily moving the surface equipment, isolating the lines, removing the impacted soils, collecting confirmation samples, backfilling the excavation, and moving the equipment back. The sidewall, bottom hole, and stockpile samples will be collected and analyzed by a third party environmental consulting company. Due to this facility being located on Fee surface, the sample results will be compared to the COGCC Table 910.1 concentration levels for “Organic Compounds in Soil” to ensure any residual concentrations are less than these thresholds. Any stockpiled soils that are greater than these thresholds will be treated onsite via mechanical soil shredding with an oxidizer additive and subsequently resampled post treatment to ensure that residual levels are <Table 910.1 concentrations. Once all concentrations are below these threshold the site will backfilled and equipment placed back into service. All additional areas that were disturbed will then be reclaimed, mulched, and reseeded. Barring any unforeseen circumstances we anticipate to be completed with these remediation activities within the next 4-5 months (September/October). Upon completion a copy of the Final Site Remediation Report will be submitted to the BLM via Sundry. If you have any questions or need additional information, please do not hesitate to contact me. Thank you!

Kyle Waggoner, PG
Field Regulatory Manager
Whiting Petroleum Corporation and its wholly owned subsidiary
Whiting Oil and Gas Corporation
208 Racquette Drive, Unit A
Fort Collins, CO 80524
Direct
Cell
Fax
kyle.waggoner@whiting.com
www.whiting.com
Berger, Keith <kberger@blm.gov>
To: "Lyon, Mark" <mlyon@blm.gov>
Cc: "Sales, Sharon" <ssales@blm.gov>

Thanks for the good work on this... especially coming at such a crazy busy time for you... GREAT JOB!

[Quoted text hidden]

--
Keith E. Berger
Field Manager
Royal Gorge Field Office
Bureau of Land Management
3029 E. Main St., Canon City CO.

kberger@blm.gov
Nature and Cause of Event: A 2" buried poly line from the recycle pump to the manifold building released ~107 bbls of crude oil. The downstream valve on the 2" poly line from the recycle pump was closed and the pump was on auto operating mode. The recycle pump activated resulting in excess pressure in the poly line which caused the line to rupture below grade. The recycle pump was shut off and the line section was isolated. The release was contained onsite and free liquids were recovered via vacuum truck.

Environmental Impact: Potholes were advanced to delineate the impacts and are utilized to monitor and recover any free product that may accumulate in them via vacuum truck. Once the lines and surface equipment are located, isolated, purged, and moved the remaining impacts >Table 910.1 will be removed via mechanical excavation.

Time Required to Control Event (Hours): 0.1 (upon discovery)

Volume Discharged or Consumed: ~107 bbls Crude Oil
Volumes Recovered: ~12 bbls

Action Taken to Control Event: Upon discovery the pump was shut off and the line was isolated. Prior to restart of the recycle pump an internal pressure relief valve will be installed to avoid discharge pressures in exceedance of the MAOP of the line. Training will be provided to lease operators regarding the process of valve verification prior to starting any recycle pump.

Resultant Damage: The poly line was damaged and the subsurface soils were impacted as a result of the release.

Clean-Up Procedures: Cleanup procedures will be conducted in accordance with COGCC rules and regulations.

Cause/Extent of Personal Injury: No personal injury occurred as the result of this release.
State of Colorado
Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

SPILL/RELEASE REPORT (INITIAL)
This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 90E.b. for reporting requirements of spills or releases of E&P Waste or produced fluids. Submit a Site Investigation and Remediation Workplan (Form 27) when requested by the Director.

OPERATOR INFORMATION

Name of Operator: WHITING OIL & GAS CORPORATION
Operator No: 96155
Address: 1700 BROADWAY STE 2300
City: DENVER State: CO Zip: 80290
Contact Person: Kyle Waggoner

Phone Numbers
Phone: [Redacted]
Mobile: [Redacted]
Email: kyle.waggoner@whiting.com

INITIAL SPILL/RELEASE REPORT
Initial Spill/Release Report Doc#: 401245981

Initial Report Date: 03/29/2017 Date of Discovery: 03/28/2017 Spill Type: Recent Spill

Spill/Release Point Location:
Location of Spill/Release: QTRQTR NESE SEC 27 TWP 10N RNG 58W MERIDIAN 6
Latitude: 40.806250 Longitude: -103.845290

Municipality (if within municipal boundaries):
County: WELD

Reference Location:
Facility Type: FLOWLINE [Redacted]
Facility/Location ID No: 433999
No Existing Facility or Location ID No.
Well API No. (Only if the reference facility is well) 05- -

Fluid(s) Spilled/Released (please answer Yes/No):
Was one (1) barrel or more spilled outside of berms or secondary containment? Yes
Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.
Were Five (5) barrels or more spilled? Yes

Estimated Total Spill Volume: use same ranges as others for values
Estimated Oil Spill Volume(bbl): >=100
Estimated Flow Back Fluid Spill Volume(bbl): 0
Estimated Other E&P Waste Spill Volume(bbl): 0
Estimated Condensate Spill Volume(bbl): 0
Estimated Produced Water Spill Volume(bbl): 0
Estimated Drilling Fluid Spill Volume(bbl): 0

Specify:

Land Use:
Current Land Use: NON-CROP LAND Other(Specify): livestock grazing
Weather Condition: cloudy 45 degrees and rain
Surface Owner: FEE Other(Specify): Castor Trust

Check if impacted or threatened by spill/Release (please answer Yes/No to all that apply):
Waters of the State Livestock Public Byway Surface Water Supply Area
Residence/Occupied Structure
As defined in COGCC 100-Series Rules
Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

A 2" buried poly line from the recyle pump to the manifold building released ~107 bbls of crude oil. The recyle pump was shut off and the line section was isolated. The release was contained onsite and free liquids were recovered via vacuum truck. We are currently repairing the line and removing impacted soils via hydrovac excavation.

List Agencies and Other Parties Notified:

<table>
<thead>
<tr>
<th>Date</th>
<th>Agency/Party</th>
<th>Contact</th>
<th>Phone</th>
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<td>Roy Rudisill</td>
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<td>notification</td>
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<tr>
<td>3/29/2017</td>
<td>Landowner</td>
<td>Castor Trust</td>
<td>-</td>
<td>notification</td>
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</table>

OPERATOR COMMENTS:

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: ___________________________ Print Name: Kyle Waggoner
Title: Field Regulatory Manager Date: 03/29/2017 Email: kyle.waggoner@whiting.com

Per Rule 906.b., the Operator shall make a supplemental report on Form 19 not more than 10 calendar days after the spill/release is discovered that includes an 8 1/2 x 11 inch topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill; all pertinent information about the spill/release known to the Operator that has not been reported previously; and information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator.

The Supplemental Spill Report for this release is due by April 7, 2017.

Attachment Check List

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General Comments

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Total: 0 comment(s)
SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 906.b. for reporting requirements of spills or releases of E&P Waste or produced fluids. Submit a Site Investigation and Remediation Workplan (Form 27) when requested by the Director.

OPERATOR INFORMATION

<table>
<thead>
<tr>
<th>Name of Operator:</th>
<th>WHITING OIL &amp; GAS CORPORATION</th>
<th>Operator No:</th>
<th>96155</th>
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</thead>
<tbody>
<tr>
<td>Address:</td>
<td>1700 BROADWAY STE 2300</td>
<td></td>
<td></td>
</tr>
<tr>
<td>City:</td>
<td>DENVER</td>
<td>State:</td>
<td>CO</td>
</tr>
<tr>
<td>Contact Person:</td>
<td>Kyle Waggoner</td>
<td>Zip:</td>
<td>80290</td>
</tr>
</tbody>
</table>

Phone Numbers

| Phone: | | Mobile: | | Email: | kyle.waggoner@whitingo.com |

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc#: 401245981

Initial Report Date: 03/29/2017  Date of Discovery: 03/28/2017  Spill Type: Recent Spill

Spill/Release Point Location:

Location of Spill/Release: QTRQTR NESE SEC 27 TWP 10N RNG 58W MERIDIAN 6

Latitude: 40.809250  Longitude: -103.845290

Reference Location:

Facility Type: FLOWLINE  Facility/Location ID No: 433999

Fluid(s) Spilled/Released (please answer Yes/No):

Was one (1) barrel or more spilled outside of berms or secondary containment? Yes

Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

Were Five (5) barrels or more spilled? Yes

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): >=100

Estimated Flow Back Fluid Spill Volume(bbl): 0

Estimated Other E&P Waste Spill Volume(bbl): 0

Estimated Condensate Spill Volume(bbl): 0

Estimated Produced Water Spill Volume(bbl): 0

Estimated Drilling Fluid Spill Volume(bbl): 0

Land Use:

Current Land Use: NON-CROP LAND  Other(Specify): livestock grazing

Weather Condition: cloudy 45 degrees and rain

Surface Owner: FEE  Other(Specify): Castor Trust

Check if impacted or threatened by spill/release (please answer Yes/No to all that apply):

Waters of the State  Residence/Occupied Structure  Livestock  Public Byway  Surface Water Supply Area

As defined in COGCC 100-Series Rules
Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

A 2' buried poly line from the recycle pump to the manifold building released ~107 bbls of crude oil. The recycle pump was shut off and the line section was isolated. The release was contained onsite and free liquids were recovered via vacuum truck. We are currently repairing the line and removing impacted soils via hydrovac excavation.

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<td>Landowner</td>
<td>Castor Trust</td>
<td>-</td>
<td>notification</td>
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</table>

OTHER NOTIFICATIONS

SPILL/RELEASE DETAIL REPORTS

#1

Supplemental Report Date: 04/07/2017

FLUIDS

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<th>BBL's RECOVERED</th>
<th>Unknown</th>
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<td>7</td>
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<tr>
<td>CONDENSATE</td>
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<td>0</td>
<td></td>
</tr>
<tr>
<td>PRODUCED WATER</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>DRILLING FLUID</td>
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<td>0</td>
<td></td>
</tr>
<tr>
<td>FLOW BACK FLUID</td>
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<td>0</td>
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<tr>
<td>OTHER E&amp;P WASTE</td>
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<td>0</td>
<td></td>
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</table>

Was spill/release completely contained within berms or secondary containment? NO
Was an Emergency Pit constructed? NO

Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit

Impacted Media (Check all that apply)

- [x] Soil
- [ ] Groundwater
- [ ] Surface Water
- [ ] Dry Drainage Feature

Surface Area Impacted: 85
Length of Impact (feet): 85
Width of Impact (feet): 71
Depth of Impact (feet BGS): 5
Depth of Impact (inches BGS): 0

How was extent determined?

Due to the subsurface lines in this area, a hydrovac excavator is being utilized to advance multiple potholes to ~6' bgs to delineate the extents of the impacts.

Soil/Geology Description:

- 27-Epping Silt Loam/61-Stoneham Fine

Depth to Groundwater (feet BGS) 37
Number Water Wells within 1/2 mile radius: 1

If less than 1 mile, distance in feet to nearest

- [ ] Water Well 2556 None
- [ ] Surface Water 1738 None
- [ ] Wetlands None
- [ ] Springs None
- [ ] Livestock None
- [ ] Occupied Building 2449 None

Additional Spill Details Not Provided Above:

The existing potholes will be utilized to recover any free product that may accumulate in them via vacuum truck. Once the lines are located, isolated, and purged the remaining impacts >Table 910.1 will be removed via mechanical excavation.
CORRECTIVE ACTIONS

#1  Supplemental Report Date:  04/07/2017

Cause of Spill (Check all that apply)  □ Human Error   □ Equipment Failure  □ Historical-Unknown

□ Other (specify)  

Describe Incident & Root Cause (include specific equipment and point of failure)

The downstream valve on the 2” poly line from the recycle pump was closed and the pump was still on auto operating mode. The recycle pump activated resulting in excess pressure in the poly line which caused the line to rupture below grade. Upon discovery the pump was shut off and the line was isolated.

Describe measures taken to prevent the problem(s) from reoccurring:

Install an internal pressure relief valve to avoid discharge pressures in excedence of the MAOP of the line. Training will be provided to lease operators regarding the process of valve verification prior to starting any recycle pump.

Volume of Soil Excavated (cubic yards):  391

Disposition of Excavated Soil (attach documentation)  □ Offsite Disposal  □ Onsite Treatment

□ Other (specify)  

Volume of Impacted Ground Water Removed (bbls):  0

Volume of Impacted Surface Water Removed (bbls):  0

REQUEST FOR CLOSURE

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure:  □ Corrective Actions Completed (documentation attached)

□ Work proceeding under an approved Form 27

Form 27 Remediation Project No:  

OPERATOR COMMENTS:

The current remediation activities are being conducted as part of this Form 19. However, if additional time is required to complete the remedial efforts we will request that we proceed under a Form 27.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed:  Kyle Waggoner  

Print Name:  Kyle Waggoner  

Title:  Field Regulatory Manager  

Date:  04/07/2017  

Email:  kyle.waggoner@whiting.com

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mg/kg - milligrams per kilogram
< - Analytical result is less than the reporting limit
COGCC - Colorado Oil and Gas Conservation Commission
GRO - Gasoline Range Organics
BRC - Benzene, Toluene, Ethyl Benzene
HUL - Hexane, Toluene, Octane

Table 1 - Confirmation Sampling Soil Analytical Data
Whiting Oil and Gas Corporation
Razor 27I
Weld County, Colorado