

State of Colorado
Oil and Gas Conservation Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109

FOR OGCC USE ONLY

OGCC Employee:

Spill Complaint
 Inspection NOAV

Tracking No: _____

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

Spill or Release Plug & Abandon Central Facility Closure Site/Facility Closure Other (describe): Pit Closure

OGCC Operator Number: <u>96850</u>	Contact Name and Telephone: <u>Karolina Blaney</u>
Name of Operator: <u>Williams Production RMT Company</u>	No: <u>970-683-2295</u>
Address: <u>1058 County Road 215</u>	Fax: <u>970-285-9573</u>
City: <u>Parachute</u> State: <u>CO</u> Zip: <u>81635</u>	

API Number: _____	County: <u>Garfield</u>
Facility Name: <u>Uphoff TR 32-3-597 (Form 15 states TR 31-3-597)</u>	Facility Number: <u>284698</u>
Well Name: <u>Uphoff TR 32-3-597</u>	Well Number: <u>N/A</u>
Location: (QtrQtr, Sec, Twp, Rng, Meridian): <u>NWNE, Sec 3, T5S, R97W</u>	Latitude: <u>39.646759</u> Longitude: <u>-108.263087</u>

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Produced Water

Site Conditions: Is location within a sensitive area (according to Rule 901e)? Y N If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): Rangeland, Non Crop Land

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Parachute Irigul-Complex, 5-30% slopes and Silas Loam 1-12%

Potential receptors (water wells within 1/4 mi, surface waters, etc.): West Fork Parachute Creek lies approximately 150 ft to the south.

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):	Extent of Impact:	How Determined:
<input checked="" type="checkbox"/> Soils	<u>The purpose of this Investigation Form 27 is to determine</u>	<u>Visual observations, field screening, and analytical analysis</u>
<input type="checkbox"/> Vegetation	<u>whether or not there are any impacts to the</u>	_____
<input type="checkbox"/> Groundwater	<u>surrounding environment.</u>	_____
<input type="checkbox"/> Surface Water	_____	_____

REMEDIATION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):
See attached and refer to COGCC Document #01175818 for details.

Describe how source is to be removed:
See attached and refer to COGCC Document #01175818 for details.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:
See attached and refer to COGCC Document #01175818 for details.



Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No: _____

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REMEDIATION WORKPLAN (Cont.)

OGCC Employee: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):
See attached and refer to COGCC Document #01175818 for details.

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.
See attached and refer to COGCC Document #01175818 for details.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? Y N If yes, describe:
See attached and refer to COGCC Document #01175818 for details.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):
See attached and refer to COGCC Document #01175818 for details.

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: TBD Date Site Investigation Completed: TBD Date Remediation Plan Submitted: TBD
Remediation Start Date: TBD Anticipated Completion Date: TBD Actual Completion Date: TBD

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

Print Name: Karolina Blaney Signed: Karolina Blaney
Title: Environmental Specialist Date: 7/12/2011

OGCC Approved: Title: FOR Chris Cumfield Date: 07/26/2011
EPS NW Region

Sensitive Area Determination Checklist

Williams Production RMT Company		
Person(s) Conducting Field Inspection	Ashlee V. Lane	6/7/11
	Biologist	
Site Information		
Location:	TR 32-3-5897	Time: 1430
Type of Facility:	Existing Well Pad	
Environmental Conditions	Clear; windy; soil conditions are dry.	
Temperature (°F)	62°	

Has the proposed, new or existing location been designated as a sensitive area?

Yes No

SURFACE WATER

1. Are there any surface water features or SWSAs adjacent to or within ¼ mile of the proposed/new or existing facility?

Yes No

If yes, list type of surface water feature(s), i.e. rivers, creeks, streams, seeps, springs, wetlands: There is one unnamed USGS identified intermittent drainage, one pond, and the West Fork Parachute Creek, a USGS identified intermittent/perennial stream.

If yes, describe location relative to facility: The unnamed USGS identified intermittent drainage is located 300 feet to the southwest, the pond is 300 feet to the southwest and the West Fork Parachute Creek is 214 feet south of the center of the facility.

2. Could a potential release from the facility reach surface water features?

Yes No

If yes, describe the pathway a release from the facility would likely follow to determine if the potential to impact surface water is high or low. Flow off of the well pad would most likely be to the south, southeast towards the West Fork Parachute Creek.

3. Is the potential to impact surface water from a facility release high or low?

High If intermittent flows are occurring in West Fork Parachute Creek.
 Low If there is no surface water is flow.

GROUNDWATER

1. Will the proposed/new or existing facility have any pits which will contain hydrocarbons and chlorides or other E&P wastes?
 Yes No
If yes, List the pit type(s): Drilling pit

2. Is the site of the proposed facility underlain by an unconfined aquifer or recharge zone?
 Yes No

3. Is the hydraulic conductivity of the underlying soil or geologic material $\leq 1.0 \times 10^{-7}$ cm/sec?
 Yes No

4. Is the proposed facility located within 1/8 mile of a domestic water well or 1/4 mile of a public water supply well which would use the same aquifer?
 Yes No

5. Is the proposed facility located within a 100 year floodplain?
 Yes (*Sensitive Area*) No (*If no, proceed to question #6.*)

6. Is the depth to groundwater known?
 Yes (*If yes, follow instructions provided in 6(a) of this section.*)
 No (*If no, follow instructions provided in 6(b) of this section.*)
 - (a) If yes, could a potential release from the proposed facility reach groundwater?
 Yes No
If yes, explain:

 - (b) If no:
 - (i) Evaluate surrounding soils, topography, and vegetation which may suggest the presence of shallow groundwater.
 - (ii) Gather information from surrounding well data in order to determine a depth to groundwater, i.e. State Engineers Office.

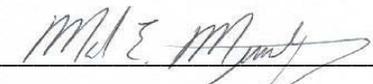
7. Is the potential to impact ground water from the facility in the event of a release high or low?
 High Low

Additional Comments:

As stated in the surface water section of this sensitive area determination, the West Fork Parachute Creek is located 214 feet south of the facility, and the unnamed USGS identified intermittent drainage and pond are located 300 feet southwest of the location. The facility, as it is currently constructed limits the direction of a potential release to the southern edge of the facility. A potential release, if it were migrate off the facility, would flow directly towards the West Fork of Parachute Creek and potentially the small pond. It is not anticipated that the unnamed intermittent drainage to the southwest of the facility would be impacted by a release due to the fact it flows towards the West Fork of Parachute Creek from the south. The section of West Fork of Parachute Creek in the immediate vicinity of the facility is identified as intermittent. By COGCC decision all of the above named surface water features are within 500 feet of the facility which would classify it as being in a sensitive area. Best Management Practices are currently installed in the form of an earthen perimeter berm and diversion ditch both of which surround the southern perimeter of the well pad.

The State Engineer's office and USGS records were reviewed and no records were revealed that would provide additional information pertaining to the depth to groundwater. The vegetative cover in the immediate vicinity of the facility does not suggest the presence of shallow groundwater. However, during the site investigation, two domestic livestock water drinkers were identified to the south of the facility. They both appear to be supplied by groundwater. Therefore the possibility of shallow groundwater may exist in the fluvial deposits associated with the West fork of Parachute Creek. During the site investigation, two (2) domestic livestock water drinkers were identified which appeared to be supplied by ground water.

Based on the data collected from the site investigation and desk top review, the potential to impact surface water features is high even with the BMP's currently in place. In addition the close proximity of the West Fork of Parachute Creek and the pond could easily be impacted by a release if it were to breach the BMP's. The impacts would be somewhat less if no intermittent flow was occurring but high during periods of intermittent flow. The two livestock drinkers, potentially supplied by groundwater could be impacted by a release off the facility. A large release could potentially infiltrate though the alluvial and fluvial sediments and impact the potential water source for the livestock drinkers. Based on the above conditions present the potential to impact both surface water and potentially groundwater is high. Therefore the facility should be designated as being in a sensitive area.

Inspector Signature(s):  Date: 6/21/2011

Mark E. Mumby, *Project Manager/RPG*
HRL Compliance Solutions, Inc.

 Date: 06/08/2011

Ashlee Lane, *Biologist*
HRL Compliance Solutions, Inc.

FORM 27 ATTACHMENT:

Describe initial Action taken:

- At the location(s) of the pit which are the furthest downgradient, lowest in elevation and/or have the potential for pooling of liquid, field-screening will be performed and will utilize appropriate field equipment which may include, but is not limited to the following.
 - a PetroFlag unit,
 - a photoionization gas detector (PID),
 - or similar, for detection of volatile hydrocarbons, in the immediate area of the pit footprint.
- Confirmation sample(s), Rule 905.b.(4), will be collected and submitted for lab analysis and verification to confirm compliance with Rule 910 and Table 910-1 (reference to specific analytes is provided below) relative to the aforementioned field screen activity.
- Other areas of the pit walls and floor will be inspected for evidence of impact via field screening and visual observation. Grab samples will be collected, as appropriate, to demonstrate diligence and thoroughness of investigation activities performed as directed in Rule 905.b.(1). In addition, all field screening activities and results will be documented and compiled into a summary report, table and/or map to be provided with the Site Closure Plan.
- Grab sample(s) will be submitted for laboratory analysis to confirm field screening activities. Sub-liner sample analytes will include considerations identified by Rule 910 and all contaminants of concern for soils from Table 910-1 excluding boron (see attached analyte list in Table 1 of Annex A; and Williams Highlands Pit Closure Plan, COGCC document #01175818).
- A visual assessment will be performed throughout the entire investigation process and will be adequately documented (e.g. field notes, observations, photographs, etc.) by qualified personnel.
- For additional information and detail of the proposed initial actions to be taken refer to the Williams Highlands Pit Closure Plan (COGCC document #01175818).

Describe how source is to be removed:

The presence of impact has not been determined at this point. No impacts have been observed to date or any other indication that would suggest there has been an event that would result in impact to the surrounding environment. However, should contamination be encountered the following actions will be taken:

- Any spill or release will be reported via a Form 19 and in accordance with Rule 906 and remediation shall be performed in accordance with requirements specified in Rules 909 and 910.
- Notification and consultation with the affected surface owner(s) shall be made with good faith effort and in accordance with Rule 906.c.
- Should a release be identified and attributed to the contents of the pit, the impacted area will be:

- excavated in which field screen instruments will guide the excavation and laboratory confirmation samples collected to demonstrate compliance with Table 910-1 of the COGCC 900-series rule; and
- placed within a lined and bermed containment cell pending remediation and disposal option described below.
- All pit contents will be evacuated and managed in accordance with all applicable local, state [i.e. Rule 905.b.(2)] and federal regulations. If disposal is required, the relevant media will be disposed of at an approved facility.
- The potential source - production pit - will be closed and reclaimed in accordance with the COGCC 900 and 1000 series rules, respectively.
- The synthetic liner will be removed either recycled/reused or disposed of at an approved facility as a solid waste and in accordance with Rule 905.b.(3). Williams personnel have no reason to suspect nor have they been informed of signs or conditions that would indicate past or present failure of the liner/containment system.
- For additional information and detail of how the potential sources is to be removed refer to the Williams Highlands Pit Closure Plan (COGCC document #01175818).

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility , land treatment on site, removal of impacted groundwater, in-situ bioremediation, burning of oily vegetation, etc.:

The presence of impact has not been determined at this point. No impacts have been observed to date or any other indication that would suggest there has been an event that would result in impact to the surrounding environment. However, should contamination be encountered the following actions will be taken:

- Any area(s) determined to be impacted/contaminated will be excavated and managed in accordance with all applicable rules and regulations regarding solid waste including applicable portion of COGCC Rule 907.
- Field screen equipment will be used to guide the excavation to ensure compliance with Table 910-1 of the COGCC 900 series rule.
- The excavated material will be placed within a lined and bermed containment cell pending the following options. Remediation and disposal options may include:
 - on-site landfarming/bioremediation,
 - in-situ remediation,
 - and/or disposal at an approved waste, management facility; as consistent with Rule 907.
- Disposal of impacted media will occur at an approved waste facility (i.e. Garfield County Landfill, Wray Gulch Landfill) further defined in the “Final disposition of E&P waste” below.
- Final disposition will be dependent upon identified contaminants, contaminant concentration, land availability, landowner approval and waste volume.
- For additional information and detail regarding the proposed approach to accomplish remediation of any impacts, if identified, refer to the Williams Highlands Pit Closure Plan (COGCC document #01175818).

If groundwater has been impacted, describe proposed monitoring plan:

- The presence of impact has not been determined at this point. No impacts have been observed to date or any other indication that would suggest there has been an event that would result in impact to the surrounding environment. However, should it be observed or determined that groundwater impacts exist an appropriate site specific monitoring and remediation plan will be developed and submitted for approval.
 - The monitoring and remediation plan will be developed to include, but is not limited to,
 - number of sample wells and/or points;
 - proposed location of sample wells and/or points;
 - sampling schedule;
 - analytical methods including analyte list(s);
 - monitoring scheme including end point; and
 - potential mitigation or remediation approaches if necessary [Rule 910 (4) E].

Describe reclamation plan:

- The pit will be reclaimed to the present grade of the location or to the approximate original contour of the landscape and consistent with the 1000-series Rule.
- Seeding of the disturbed area will be performed in accordance with its' intended use. The seed mix will be prescribed by the landowner.
- There are no known noxious weeds in the immediate area of the disturbance. A noxious weed survey is performed annually of the Trail Ridge field which includes this location.
- As a preventative measure, Williams seeds all disturbed areas as soon as practicable with temporary or sterile annual seed mixes to:
 - provide soil stability, and
 - serve as a nurse or cover crop for desired species; derived from the natural seed bank and/or the applied seed mix.
- Bare ground treatment is a common practice by Williams and any identified noxious weed species will be spot treated for immediate eradication and prevention of encroachment and dispersal.
- A plat of the location is attached for topographic and geographic reference.

Attach samples and analytical results taken to verify remediation of impacts. Show location of samples on an onsite schematic or drawing. Is further site investigation required?:

- The presence of impact has not been determined at this point; therefore, the need for further site investigation has not been determined at this time.
- A determination of whether further site investigation is required and is pending field assessments and screening, which are to be confirmed by analytical results from an accredited - NELAP - laboratory (e.g. Evergreen Analytical Laboratory).
- Final documentation of investigation and closure activities shall be submitted to the Division within thirty (30) days after conclusion of any and all remediation and

reclamation activity and in accordance with all applicable sections and subsections of Rule 909.

Final disposition of E&P waste:

- If the stockpiled volume is small enough to manage on-site, there is available area on location, concentrations are within a reasonable range to be remediated in a timely manner and the identified contaminants are conducive to bioremediation, landfarming or in-situ remediation may occur as approved and in accordance with Rule 907.
- Should the aforementioned attributes do not exist or concentrations are not conducive to bioremediation then off-site disposal will be the final disposition of all impacted materials.
- If the latter option is taken, disposal will occur at an approved treatment, storage or disposal facility (TSD) which may include, but is not limited to, the following facilities:
 - the West Garfield County Landfill (045-LFL-005; Parachute, CO);
 - or the Wray Gulch Landfill (103-LFL-020; Meeker, CO).
- Any soils requiring treatment that, once treated, fall below the allowable concentrations and levels provided in Table 910-1 may be recycled and reused at Williams facilities as fill material.

ANNEX A:

Confirmatory Analyte List for Potential Contaminants of Concern in Soil:

Table 1 – Sample collection, handling and analysis summary

Analyte Class	Analysis	Method	COGCC Table 910-1 Standard	Holding Time	Container	
Organics	TVPH (GRO)	SW8015 mod	500 mg/kg	14 days	4 oz. wide mouth jar	
	TEPH (DRO)					
	Benzene	SW8021	0.17 mg/kg	14 days	4 oz. wide mouth jar	
	Toluene		85 mg/kg			
	Ethylbenzene		100 mg/kg			
	Xylenes (total)		175 mg/kg			
	Acenaphthene		1,000 mg/kg			
	Anthracene	SW8270	0.22 mg/kg	14 days	4 oz. wide mouth jar	
	Benzo (A) anthracene					
	Benzo (B) flouranthene					
	Benzo (K) fluoranthene					
	Benzo (A) pyrene					0.022 mg/kg
	Chrysene					22 mg/kg
	Dibenzo (A,H) anthracene					0.022 mg/kg
	Fluoranthene					1,000 mg/kg
	Fluorne					0.22 mg/kg
	Indeno (1,2,3,C,D) pyrene					
	Naphthalene	23 mg/kg				
	Pyrene	1,000 mg/kg				
Inorganics	Electrical Conductivity	USDA Hdbk	<4 mmhos/cm or 2x background	28 days	4 oz. wide mouth jar	
	Sodium Adsorption Rate	USDA Hdbk 60 Method 20B or 3A	<12	180 days	1 gal. ziplock bag	
	pH	SW9045	6-9	< 24 hrs.	2 oz. wide mouth jar	

Rem # _____
 OGCC # _____

Table 1 Cont'd - Sample collection, handling and analysis summary

Analyte Class	Analysis	Method	COGCC Table 910-1 Standard	Holding Time	Container
Total Metals*	Arsenic	SW 6010, 6020, 7470	0.39 mg/kg	28 days for Hg & 180 days for remaining	4 oz. wide mouth jar
	Barium		15,000 mg/kg		
	Cadmium		70 mg/kg		
	Chromium (III)		120,000 mg/kg		
	Chromium (IV)		23 mg/kg		
	Copper		3,100 mg/kg		
	Lead (inorganic)		400 mg/kg		
	Mercury		23 mg/kg		
	Nickel (soluble salts)		1,600 mg/kg		
	Selenium		390 mg/kg		
	Silver		390 mg/kg		
	Chloride		15,000 mg/kg		

General note: Preservation standards for organics and inorganics in soil are < 4°C as per EAL protocol. Of the above sample methods and procedures, none require a preservative to preserve sample integrity.

Note(): Boron (hot water soluble) has been excluded from this analyte list as no crops (citrus or nuts) or other vegetation which may be sensitive to boron are known or are expected to be encountered. Should the Director or COGCC EPS decide to, at his discretion, require a Boron analysis the above analyte list will be modified to reflect that change and requirement, at that point in time.*

Rem # _____
 OGCC # _____