

State of Colorado Oil and Gas Conservation Commission

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401297665

Receive Date:

06/01/2017

Report taken by:

CARLOS LUJAN

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by COGCC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

OPERATOR INFORMATION

Name of Operator: <u>ENCANA OIL & GAS (USA) INC</u>	Operator No: <u>100185</u>	Phone Numbers
Address: <u>370 17TH ST STE 1700</u>		Phone: <u>(970) 2852925</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202-5632</u>
Contact Person: <u>Matt Kasten</u>	Email: <u>matt.kasten@encana.com</u>	Mobile: <u>(970) 9019007</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 7167 Initial Form 27 Document #: 2229808

PURPOSE INFORMATION

- | | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water |
| <input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste | <input type="checkbox"/> Rule 906.c.: Director request |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input checked="" type="checkbox"/> Other <u>LINED EARTHEN PIT CLOSURE</u> |

SITE INFORMATION

N Multiple Facilities (in accordance with Rule 909.c.)

Facility Type: <u>PIT</u>	Facility ID: <u>285021</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>NP EF07B N30 595</u>		Latitude: <u>39.581253</u>	Longitude: <u>-108.098522</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SESW</u>	Sec: <u>30</u>	Twp: <u>5S</u>	Range: <u>95W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications MH

Most Sensitive Adjacent Land Use RANGELAND

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

ACCORDING TO COGCC GIS ONLINE MAPPING THERE IS ONE STREAM, AND ONE WATER WELL WITHIN 1/4 MILE.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- ☐ E&P Waste ☒ Other E&P Waste ☐ Non-E&P Waste
- ☐ Produced Water ☐ Workover Fluids
- ☐ Oil ☐ Tank Bottoms
- ☐ Condensate ☐ Pigging Waste
- ☐ Drilling Fluids ☐ Rig Wash
- ☐ Drill Cuttings ☐ Spent Filters
- ☒ Pit Bottoms
- ☐ Other (as described by EPA)

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	IMPACTS WILL BE DETAILED IN FORM 19	IMPACTS WILL BE DETAILED IN FORM 19

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

All activities conducted in support of this pit closure project will be carried out in accordance with COGCC Rules 905, 907, and 909 for conducting a site investigation in support of this pit closure. The following discussion was prepared to present general procedures for Encana's approach to pit closures and any associated remediation and documentation. All subsequent data gathered in support of this project will be

submitted to the COGCC as required in a Form 19 (Spill/Release Report), Notification of Completion and Form 4 (Sundry Notice), and will reference the COGCC assigned Remediation Project number. The following activities have, or will be carried out in support of pit closure activities conducted in support of this project: 905.b(2) & 905.b(4) ? All above‐liner fluids and solids will be removed from the pit and will be reused or disposed of at a permitted disposal facility under manifest. 905.b(3) ? Liner will be removed, and reused/recycled or disposed of at a permitted disposal facility

under manifest. 905.b(4) ? Representative samples will be collected from the pit bottom following removal of the pit liner

and will be analyzed for compliance with COGCC Table 910‐1. Sample results will be provided to the COGCC in supplementary submission(s) for this remediation project. 905.c ? In the event of the constituents of concern found below the liner are in excess of Table 910‐1 allowable concentrations and above background concentrations, Form 19 (Spill/Release Report) will be submitted to document the failure of the pit liner and subsequent release of fluids. If below‐liner concentrations identified in Table 910‐1 allowable concentrations, but below

background no Form 19 will be submitted. However, a Form 4 (Sundry Notice) and Notification of Completion will be submitted to document the onsite disposal of material in excess of the allowable concentrations identified in Table 910‐1.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

☒ Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

See attached

Proposed Groundwater Sampling

☒ Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

See attached

Proposed Surface Water Sampling

☐ Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Surface water samples are collected down gradient from this location on a quarterly basis for Encana's North Parachute Ranch water sampling program.

Additional Investigative Actions

☒ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

See attached

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 82

Number of soil samples exceeding 910-1 31

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 12500

NA / ND

-- Highest concentration of TPH (mg/kg) 13450

-- Highest concentration of SAR 46

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 52

Groundwater

Number of groundwater samples collected 77

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 45

Number of groundwater monitoring wells installed 7

Number of groundwater samples exceeding 910-1 2

-- Highest concentration of Benzene (µg/l) 1.4

-- Highest concentration of Toluene (µg/l) 7.1

-- Highest concentration of Ethylbenzene (µg/l) 6.6

-- Highest concentration of Xylene (µg/l) 11

NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 Number of surface water samples exceeding 910-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☐ Were background samples collected as part of this site investigation?

☐ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards)

Volume of liquid waste (barrels)

☒ Is further site investigation required?

The site investigation for this project will be carried out as described above. All analytical data collected in support of this remediation project will be provided to the COGCC in a Form 19, if applicable, and/or in the Form 4 (Sundry Notice) and Notification of Completion. A site diagram showing the location of collected samples will also be provided. In the event that groundwater contamination is identified, or the depth of contamination makes removal of

impacted material through conventional excavation impractical, the vertical and lateral extent of contamination would be determined by a third party contractor and an appropriate insitu remediation and monitoring plan would be developed and submitted to the COGCC for prior approval.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Any impacted material identified below the liner would be evaluated upon discovery and depending upon severity would be removed using heavy equipment and remediated onsite, or disposed of offsite at a permitted disposal facility. The effectiveness of excavation efforts and removal of impacts will be verified through sample collection and laboratory analysis conducted in accordance with COGCC Rule 910, and to reflect the procedures described above. These activities would be described in the Form 4 (Sundry Notice) and Notification of Completion for this remediation project. Any impacts identified below the liner would be documented and reported on a Form 19 (Spill/Release Report).

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

See attached

Soil Remediation Summary

☒ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
Yes _____ Air sparge / Soil vapor extraction
Yes _____ Natural Attenuation
_____ Other _____

☐ Ex Situ

_____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

Yes _____ Bioremediation (or enhanced bioremediation)
□ _____ Chemical oxidation
□ _____ Air sparge / Soil vapor extraction
□ _____ Natural Attenuation
□ _____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

In the event that impacts to groundwater are identified, a vertical and lateral extent would be determined by a third party contractor and an appropriate insitu remediation and monitoring plan would be prepared and submitted to the COGCC for prior approval.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report
☐ Other _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No _____

Do all soils meet Table 910-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? _____

Does Groundwater meet Table 910-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

RECLAMATION PLAN

RECLAMATION PLANNING

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.

The footprint for the backfill pit occurs within the pad boundary for this location. During reclamation the backfill pit may be part of the pad's working surface and/or covered by recontoured and reseeded sloped installed to meet reclamation objectives. Interim and final reclamation activities will be carried out in accordance with COGCC 1000 Series requirements, and will be documented accordingly.

Is the described reclamation complete? _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

☐ Interim? ☐ Final?

Did the Surface Owner approve the seed mix? _____

If NO, does the seed mix comply with local soil conservation district recommendations? _____

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). _____ 08/08/2012

Date of commencement of Site Investigation. _____ 08/08/2012

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____ 08/08/2012

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Attn: Carlos Lujan

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

Signed: Matt Kasten

Title: Env. Consultant

Submit Date: 06/01/2017

Email: matt.kasten@encana.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: CARLOS LUJAN

Date: 06/13/2017

Remediation Project Number: 7167

COA Type**Description**

	Submit a progress report by mid-August describing: 1) The use of the trailer mounted SVE system, the PID readings over time, and plans for continued use of the SVE system. Consider enhancement or changes in remediation system if TPH concentrations do not improve. 2) Include results of radius of influence for the SVE system. According to borelog information soil seems to be mostly clay. 3) Present a schedule for comprehensive soil boring and soil sampling.
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Attachment Check List

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num**Name**

401297665	FORM 27-SUPPLEMENTAL-SUBMITTED
401297750	SITE INVESTIGATION REPORT
401297752	REMEDATION PROGRESS REPORT
401297798	ANALYTICAL RESULTS
401297799	ANALYTICAL RESULTS

Total Attach: 5 Files

General Comments**User Group****Comment****Comment Date**

Environmental	Continue skimming the free-phase and the pump and treat system to minimize the extent of the free-phase. Groundwater samples showed no detected BTEX. Continue monitoring GW quarterly.	06/02/2017
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Total: 1 comment(s)