

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
401298580
Receive Date:
07/05/2017

Report taken by:
ALEX FISCHER

Site Investigation and Remediation Workplan (Initial 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 INFORMATON

Name of Operator: <u>WESCO OPERATING INC</u>	Operator No: <u>95520</u>	Phone Numbers
Address: <u>120 S DURBIN STREET</u>		Phone: <u>(307) 577-5324</u>
City: <u>CASPER</u> State: <u>WY</u> Zip: <u>82602</u>		Mobile: <u>(307) 258-5878</u>
Contact Person: <u>Gene VanDeest</u>	Email: <u>genev@kirkwoodcompanies.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 10268 Initial Form 27 Document #: 401298580

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>Notice of Intent, Intending to bioremediate a soil pile located at the Maudlin Gulch Tank Battery.</u>

SITE INFORMATION N Multiple Facilites (in accordance with Rule 909.c.)

Facility Type: <u>LOCATION</u>	Facility ID: <u>428531</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>Maudlin Gulch Tank Battery</u>	Latitude: <u>40.286188</u>	Longitude: <u>-108.025465</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>26</u>	Twp: <u>4N</u>	Range: <u>95W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use Grazing

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

Facility spill catch containments along with a pond are located within 1/4 mile of the facility.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	Impacted soils	Sampled

INITIAL ACTION SUMMARY

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

Impacted soils were taken to the tank battery and put into a permitted earthen berm containment area.

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):

Soil samples were taken from the remediated pile located in the permitted earthen berm containment pit by contracted persons. The contracted persons will sample the remediated pile every 6 months till the pile meets COGCC passing standards.

Proposed Groundwater Sampling

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

Proposed Surface Water Sampling

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

Additional Investigative Actions

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

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 910-1 _____
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) _____

NA / ND

_____ Highest concentration of TPH (mg/kg) _____
_____ Highest concentration of SAR _____
_____ BTEX > 910-1 _____
_____ Vertical Extent > 910-1 (in feet) _____

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) _____
Number of groundwater monitoring wells installed _____
Number of groundwater samples exceeding 910-1 _____

_____ Highest concentration of Benzene (µg/l) _____
_____ Highest concentration of Toluene (µg/l) _____
_____ Highest concentration of Ethylbenzene (µg/l) _____
_____ Highest concentration of Xylene (µg/l) _____
_____ Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
_____ 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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Once remediated and passing COGCC standards, the soils will be taken to the Maudlin Gulch 25 well pad and spread out.

REMEDICATION 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.

Intending to bioremediate a soil pile located at the Maudlin Gulch Tank Battery. The remediation process is estimated to treat 500 cubic yards of soil. Contracted persons are anticipating 80 - 100 cubic yards per day to bioremediate, taking them approximately 5 days to complete the bioremediation.

Soil Remediation Summary

In Situ

Ex Situ

Yes Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____

Natural Attenuation

Excavate and onsite remediation

Other _____

Land Treatment

Bioremediation (or enhanced bioremediation)

Chemical oxidation

Other _____

Groundwater Remediation Summary

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.

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: _____

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.

Intending to bioremediate a soil pile located at the Maudlin Gulch Tank Battery. The remediation process is estimated to treat 500 yards of soil and the work will be contracted out. The remediation will be bacterial treatment for hydrocarbon contamination and sampling will be taken by contracted persons.

Is the described reclamation complete? No _____

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). _____

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 07/01/2017

Date of completion of Remediation. 07/01/2018

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Submitted as a Form 4 and requested to file as a Form 27.

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

Signed: Gene VanDeest

Title: HSE Coordinator

Submit Date: 07/05/2017

Email: genev@kirkwoodcompanies.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: ALEX FISCHER

Date: 07/18/2017

Remediation Project Number: 10268

COA Type**Description**

	Treated materials shall be tested for Table 910-1 constituents. A minimum of one discrete sample per 100 cubic yards shall be collected and tested for the complete Table 910-1.
	Monthly Supplemental F27s shall be submitted providing a project status including a diagram showing sampling locations, sample depths, laboratory analytical data tables and complete analytical reports.
	The treatment area shall be contained in the bermed "pit" area immediately adjacent to the west side of the tank battery. NO treatment shall occur outside of this contained area. The Treatment/Containment area where land treatment is occurring shall be closed per COGCC 900 Series rules at the conclusion of the treatment period.
	WESCO shall complete remediation within three years of the date of this conditional approval – by July 1, 2020. In the event any treated waste fails to meet Table 910-1 standards within three (3) years, it must be removed and disposed of at a commercial facility within 30 days. Disposal documentation must be received by COGCC within 15 days following disposal.
	Final Compliance demonstration samples (location) selection should be guided by rule 910.b(3)B and enough samples to adequately characterize the volume of soil being treated.
	Any fluid accumulation inside the containment are should be removed and disposed of as E&P waste.
	Implement stormwater controls to prevent stormwater runon and runoff through containment area.
	Only impacted material from the existing containment area shall be placed in land treatment area. No additional wastes shall be treated in this area. Addition of other waste will result in a violation of use of this remediation plan and the location will be converted to a central E&P facility, meeting 908.d requirements.
	Land Treatment of oily waste shall be performed in strict accordance with the requirements of COGCC Rule 907.e.(2).

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**

401298580	FORM 27-INITIAL-SUBMITTED
401332193	ANALYTICAL RESULTS
401332199	REMEDIAL ACTION PLAN
401332203	OTHER

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)