

State of Colorado Oil and Gas Conservation Commission

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Document Number:

401415286

Receive Date:

09/28/2017

Report taken by:

CARLOS LUJAN

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 INFORMATION

Name of Operator: <u>BERRY PETROLEUM COMPANY LLC</u>	Operator No: <u>10091</u>	Phone Numbers Phone: <u>(970) 5207</u> Mobile: <u>(970) 9482785</u>
Address: <u>5201 TRUXTUN AVENUE #100</u>		
City: <u>BAKERSFIELD</u>	State: <u>CA</u> Zip: <u>90339</u>	
Contact Person: <u>Tom Hogelin</u>	Email: <u>THogelin@bry.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10547Initial Form 27 Document #: 401415286

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>Remediation of buried drill cuttings that were inadvertently buried</u> |

SITE INFORMATION

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>335568</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>LONG RIDGE J15 595</u>		Latitude: <u>39.611110</u>	Longitude: <u>-108.038230</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>15</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 MLMost Sensitive Adjacent Land Use GrazingIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? No

Other Potential Receptors 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	330 CY	Excavation

INITIAL ACTION SUMMARY

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

5 bores were made in the suspected area on August 23, 2016 - two of the bores failed the 910-1 standards. Area was excavated on April 5, 2017 and approximately 330 cubic yards of contaminated soils were spread out and landfarmed.

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):

Composite samples consisting of 8 -16 subsamples will be taken semi-annually until 910-1 standards are met and then discrete samples will be taken.

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 6

Number of soil samples exceeding 910-1 3

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

Approximate areal extent (square feet) 3200

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

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.

NA / ND

 -- Highest concentration of TPH (mg/kg) 625.5
 7

 -- Highest concentration of SAR 4.03

 BTEX > 910-1 No

 Vertical Extent > 910-1 (in feet) 8

 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)

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.

Contaminated soils will be landfarmed on site until 910-1 standards are met

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.

Contaminated soil has been spread out to less than 18" in depth; material will be turned with chisel point plow 8 - 10 times during the warm weather months.

Soil Remediation Summary

☐ In Situ

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

☒ Ex Situ

_____ No Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ Yes Excavate and onsite remediation
_____ Yes Land Treatment
_____ No Bioremediation (or enhanced bioremediation)
_____ No Chemical oxidation
_____ No Other _____

Groundwater Remediation Summary

_____ No Bioremediation (or enhanced bioremediation)
_____ No Chemical oxidation
_____ No Air sparge / Soil vapor extraction
_____ No Natural Attenuation
_____ No 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? No

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.

Adjacent fresh water pond will undergo final reclamation with landfarming continuing on the J15 595 pad. Upon achieving 910-1 standards, the contaminated material will be buried and the J15 595 well pad will undergo interim reclamation.

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? Yes

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. 08/23/2016

Date of completion of Site Investigation. 04/05/2017

REMEDIAL ACTION DATES

Date of commencement of Remediation. 03/29/2017

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Submitting landfarm plan for spoils that were excavated from buried drill cuttings on J15 595 well pad and lab analysis from September 2016 and June and September 2017. The latest test reports Benzo(a)pyrene at 0.0343. All other results were below the standards.

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

Signed: Tom Hogelin

Title: Construction Foreman

Submit Date: 09/28/2017

Email: THogelin@bry.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: 10/02/2017

Remediation Project Number: 10547

COA Type**Description**

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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**

401415286	FORM 27-INITIAL-SUBMITTED
401415359	REMEDATION PROGRESS REPORT
401415361	REMEDATION PROGRESS REPORT
401415362	RECLAMATION PLAN
401415364	REMEDATION PROGRESS REPORT

Total Attach: 5 Files

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

Environmental	According to the attached report doc #401415364, dated April 11, 2017, spoils from the former production pit exceeded Table 910-1 on TEPH with 578.3 mg/kg and benzo(a)pyrene with 0.049 mg/kg.	10/02/2017
Environmental	The Form 27 is conditionally approved; however, additional information or activities may be required during the course of remediation. Conditions of Approval (COAs) will be forthcoming on Supplemental Form 27s.	10/02/2017

Total: 2 comment(s)