

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:  
401452818  
Receive Date:  
11/09/2017

Report taken by:  
RICK ALLISON

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: SRC ENERGY INC	Operator No: 10311	<b>Phone Numbers</b>
Address: 1675 BROADWAY SUITE 2600		Phone: (970) 4755220
City: DENVER State: CO Zip: 80202		Mobile: (303) 2291228
Contact Person: Brad Rogers	Email: brogers@srcenergy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10672 Initial Form 27 Document #: 401452818

PURPOSE INFORMATION

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

SITE INFORMATION

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

Facility Type: SPILL OR RELEASE	Facility ID: 451116	API #: _____	County Name: WELD
Facility Name: Eldridge 4-23	Latitude: 40.475524	Longitude: -104.736213	
	** correct Lat/Long if needed: Latitude: 40.475525	Longitude: -104.736236	
QtrQtr: SENE	Sec: 23	Twp: 6N	Range: 66W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use agriculture  
 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? Yes

Other Potential Receptors within 1/4 mile

# 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 checked="" 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	GROUNDWATER	to be determined	Analyzed groundwater from sample point on pad
Yes	SOILS	to be determined	Analyzed soils from sample points on facility

## INITIAL ACTION SUMMARY

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

release was historical release found from removal of concrete water vault. Upon removal water vault, excavation activities were started to remove impacted soils near release point. Based on excavation and soil/groundwater samples collected it was determined that further site delineation was needed. Surface owner has refused to grant SRC Energy access to property to complete further investigation.

## 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 ):

From initial excavation activity, eight sidewall soil samples were collected at approximately 8 feet bgs using grab method. Additional soil samples are planned to be collected to further delineate impacted area.

### Proposed Groundwater Sampling

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

Groundwater samples have been collected on SRC operated location. SRC will continue to collect groundwater samples quarterly from the monitoring wells installed.

### 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 ):

SRC still needs to conduct further investigation of area to determine off-site impacts from water pit release. Currently we are unable to complete investigation due to surface owner's refusal to grant access.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 14  
Number of soil samples exceeding 910-1 9  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 3000

### NA / ND

-- Highest concentration of TPH (mg/kg) 4761  
NA Highest concentration of SAR           
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 8

### Groundwater

Number of groundwater samples collected 10  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 7'  
Number of groundwater monitoring wells installed 8  
Number of groundwater samples exceeding 910-1 7

-- Highest concentration of Benzene (µg/l) 19600  
-- Highest concentration of Toluene (µg/l) 5170  
-- Highest concentration of Ethylbenzene (µg/l) 17000  
-- Highest concentration of Xylene (µg/l) 46400  
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?

We are currently unable to obtain access to the land surrounding the impacted area. Surface owner is refusing to grant SRC access to conduct further investigation to understand off-site impacts. Proposed monitoring well location map is attached showing a proposed fourteen additional monitoring well locations to further define soil/groundwater impacts.

# REMEDIAL ACTION PLAN

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Some excavation of impacted soils has been completed on SRC location. Excavation was stopped to further investigate area for impacts. Source removal will be determined once more investigation is conducted.

## 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.

Groundwater amendment was added to initial excavated area to treat groundwater. Monitoring wells were installed To be determined once location can be fully delineated

## Soil Remediation Summary

### In Situ

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ 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

- \_\_\_\_\_ 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.

8 monitoring wells have been installed on SRC location. Quarterly samples will be collected. 14 additional monitoring wells are proposed to be installed.

# REMEDIATION 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.

Reclamation will follow COGCC guidelines and regulations.

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. 06/14/2017

Actual Spill or Release date, if known. 06/14/2017

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/14/2017

Date of commencement of Site Investigation. 06/14/2017

Date of completion of Site Investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Date of commencement of Remediation. \_\_\_\_\_

Date of completion of Remediation. \_\_\_\_\_

### SITE RECLAMATION DATES

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

--

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

Signed: Brad Rogers \_\_\_\_\_

Title: Environmental Supervisor \_\_\_\_\_

Submit Date: 11/09/2017 \_\_\_\_\_

Email: brogers@srcenergy.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: RICK ALLISON \_\_\_\_\_

Date: 11/14/2017 \_\_\_\_\_

Remediation Project Number: 10672 \_\_\_\_\_

**COA Type****Description**

	Submit Quarterly Monitoring Reports while site investigation and access negotiation continue.
--	---

**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**

401452818	FORM 27-INITIAL-SUBMITTED
401454389	GROUND WATER SAMPLE LOCATION
401454392	GROUND WATER SAMPLE LOCATION
401454393	SOIL SAMPLE LOCATION MAP
401454395	GROUND WATER ELEVATION MAP
401454396	SITE MAP
401454399	ANALYTICAL RESULTS
401454402	ANALYTICAL RESULTS
401454403	OTHER
401454413	ANALYTICAL RESULTS
401454417	ANALYTICAL RESULTS
401454464	SITE MAP

Total Attach: 12 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)