

# State of Colorado Oil and Gas Conservation Commission

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401297731

Receive Date:

07/27/2017

Report taken by:

Stan Spencer

## 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: TEP ROCKY MOUNTAIN LLC	Operator No: 96850	<b>Phone Numbers</b> Phone: (970) 263-2760 Mobile: ( )
Address: PO BOX 370		
City: PARACHUTE	State: CO Zip: 81635	
Contact Person: Michael Gardner	Email: MGardner@terraep.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 4964 Initial Form 27 Document #: 2606295

#### 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 PRODUCTION PIT CLOSURE   |

#### SITE INFORMATION

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

Facility Type: PIT	Facility ID: 277093	API #:	County Name: GARFIELD
Facility Name: CHEVRON TR 33-33-597		Latitude: 39.568126	Longitude: -108.280682
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWSE	Sec: 33	Twp: 5S	Range: 97W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications OH

Most Sensitive Adjacent Land Use NON CROP LAND

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

#### Other Potential Receptors within 1/4 mile

None - closest surface water is Pearl Creek at ~1950ft to the east.

## 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
No	SOILS	No impacts observed	FIELD SCREEN, VISUAL, LAB RESULTS

### INITIAL ACTION SUMMARY

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

See Attachment

### 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 ):

Samples were collected from the true pit bottom and side walls at center point as no dark staining was observed to negate otherwise.

#### Proposed Groundwater Sampling

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

Groundwater is not suspected to be impacted as no impacts to the pit subsoils are present.

#### Proposed Surface Water Sampling

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

No indications of surface water impacts have occurred or are suspected

### Additional Investigative Actions

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

Confirmation sampling indicated that soils satisfy COGCC Table 910-1 thresholds and no additional sampling is required.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 5

Number of soil samples exceeding 910-1 0

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

Approximate areal extent (square feet) 0

### NA / ND

-- Highest concentration of TPH (mg/kg) 26.63

-- Highest concentration of SAR 18

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 0

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 100'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

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?

Background samples from the adjacent location, approximately 4000ft to the northwest (TR 24-28-597) were used as a comparison as the soils, topography, and elevation are all the same. Background samples were used to compare arsenic and inorganic values to concentrations within the pit.

☐ 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

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.

No impacts exceeding COGCC Table 910-1 thresholds were observed in the sub soils of the pit.

### **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.

No remediation necessary as analytical data in ESC Report L907464 indicate that soils do not satisfy COGCC Table 910-1 thresholds on the pit bottom and side walls. Pit liner materials were removed, banded and recycled.

### **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  
\_\_\_\_\_ No 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  
\_\_\_\_\_ ☐ 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.

Not applicable as no impacted were detected

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Final

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

☒ Other Notice of Completion (NOC)

### 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: \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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? Yes

Is additional groundwater monitoring to be conducted? No

## 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.

Material utilized to backfill the pit will be the original excavated soil from construction of the pit. The soil will be placed in five foot lifts and will not be compacted beyond the point of making an impenetrable layer but sufficient to suppoose subsequent operations and prevent subsidence. The pit will be reclaimed in accordance with the COGCC 1000 Series Rule in addition to all SUA/COA's per the land owner

Is the described reclamation complete? Yes

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? Yes

## 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). 05/05/2017

Date of commencement of Site Investigation. 05/05/2017

Date of completion of Site Investigation. 06/09/2017

### **REMEDIAL ACTION DATES**

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

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

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. 06/16/2017

Date of completion of Reclamation. 06/23/2017

**OPERATOR COMMENT**

Please forward onto Stan Spencer

Attached is the confirmation data and information regarding the TR 33-33-597 production pit. Analytical data indicates that the pit does not exceed COGCC Table 910-1 standards and no remediation is necessary. TEP is requesting an allowance to arsenic as background values are comparable and any inorganic exceedance will be capped with 3ft of native cover.

Initial Form 27 contains the reference document # on the COGCC database (Doc# 04510689) but will not validate on Related Forms

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

Signed: Michael Gardner

Title: TEP Environmental

Submit Date: 07/27/2017

Email: MGardner@terraep.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: Stan Spencer

Date: 07/27/2017

Remediation Project Number: 4964

**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**

401297731	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
401297816	SOIL SAMPLE LOCATION MAP
401297820	ANALYTICAL RESULTS
401297822	ANALYTICAL RESULTS
401356222	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

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

Environmental	<p>Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.</p> <p>Materials with pH, SAR, or EC concentrations exceeding Table 910-1 levels may be buried under a minimum of three (3) feet of backfill cover and soil that satisfies either the Table 910-1 levels for pH, SAR, and EC or the background levels for such contaminants within three (3) feet of the ground surface at the site. In addition, soil horizons must be replaced in their original relative position and reclaimed in accordance with 1000 Series Rules, including the establishment of vegetative cover on non-cropland and successful crop growth on cropland.</p>	07/27/2017
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Total: 1 comment(s)