

# 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:

401448130

Receive Date:

11/02/2017

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: CPX PICEANCE HOLDINGS LLC	Operator No: 10639	<b>Phone Numbers</b> Phone: (303) 489-8773 Mobile: (303) 489-8773
Address: 1036 COUNTRY CLUB ESTATES DR		
City: CASTLE ROCK	State: CO Zip: 80108	
Contact Person: Ward Giltner	Email: wgiltner@yahoo.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 10737

Initial Form 27 Document #: 401448130

#### 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 checked="" 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 type="checkbox"/> Other _____   |

#### SITE INFORMATION

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

Facility Type: LAND APPLICATION SITE	Facility ID: 452466	API #: _____	County Name: GARFIELD
Facility Name: TPR 25A Land Application		Latitude: 39.404773	Longitude: -107.832457
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: SWSE	Sec: 25	Twp: 7S	Range: 94W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications GP

Most Sensitive Adjacent Land Use Surface Water  
(Beaver Creek)  
1,110 feet  
southeast

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

## 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	Soil pile	Soil pile was 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.

No initial action has been taken. The second lift of soil is currently landspread. The remaining soil pile is on location.

### 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 ):

#### 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.

To be determined by the Operator pending financial analysis and review by legal counsel. A meeting is scheduled with the COGCC on Nov. 8, 2017.

## 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.

The subject material consists of drill cuttings and mud mixed with sawdust (called "soil") and contained in a pile near the northeast part of Pad 25A. Landspreading commenced in January 2014 with the first lift of soil. A site diagram of the location of the landspreading is attached. The first lift of soil was stirred and turned over on the following dates: 6/12/14, 7/25/14, 8/27/14, 6/4/15, 8/13/15. The first lift of soil was sampled on 9/17/15, lab report D75359. There were two soil samples submitted, each a composite of five locations. The COGCC approved stockpiling of the first lift of soil on 12/2/15, Doc# 400938376. COGCC approved spreading the second lift of soil 6/7/16, Doc#401055743. The first lift of soil was removed from Pad 25A and stockpiled on location, and the second lift of soil was landspread June 15, 2016. The second lift of soil was stirred and turned on 7/28/16, 9/6/16, 10/12/16, 6/22/17. The second lift of soil was sampled on 7/11/17, lab report D95794. The locations of the samples were similar to the earlier sampling, and again two soil samples were submitted, each sample a composite of five locations. The Operator received the lab report on 8/31/17 and reviewed the report on 9/1/17. On 9/8/17, the COGCC was notified of the lab results, which included exceedences of five PAH analyses. A detailed write-up is attached.

## 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

☐ 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? Yes

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

Material is slated to use as fill for Pad 25 pad reclamation.

Volume of E&P Waste (solid) in cubic yards 2970

E&P waste (solid) description Drill cuttings and mud, mixed with sawduct

COGCC Disposal Facility ID #, if applicable: 0

Non-COGCC Disposal Facility: \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels 0

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.

Interim reclamation has not yet started. The location is graded and has a gravel surface. The area is covered by a stormwater management program.

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). 09/01/2017

Date of commencement of Site Investigation. 11/02/2017

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

Further detail may be provided after meeting with COGCC on Nov. 8, 2017.

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

Signed: Mary Griggs

Title: Regulatory Consultant

Submit Date: 11/02/2017

Email: griggs.mary@comcast.net

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: 11/28/2017

Remediation Project Number: 10737

### COA Type

### Description

	Within 45-days of Document Number 401448130 approval, Post a Bond for Financial Assurance in the amount of \$200,000.00.
	Within 45-days of Document Number 401448130 approval, Submit a variance request to continue managing the cuttings on site (Compliance issues: 1) Rule 908. Centralized Waste Mgmt Facility; 2) Rule 1003. Interim Reclamation
	Submit a supplemental e-form 27 with a comprehensive Waste Management Work Plan by December 08, 2017, including storm water management (berms, drainage); height of the land treatment cells; tiling frequency, sampling events, etc.

### 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

401448130	FORM 27-INITIAL-SUBMITTED
401448270	ANALYTICAL RESULTS
401448271	SOIL SAMPLE LOCATION MAP
401448273	ANALYTICAL RESULTS
401448277	OTHER
401448336	OTHER

Total Attach: 6 Files

### General Comments

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Plan discussed by CPX asnd COGCC will consist in: 1) Spread the cuttings on the pad, segregating material of different aspect if possible; 2) Establish a grid and sample each grid; 3) Separate soil in three groups: a) Pass Table 910-1, material suitable for beneficial use, b) Above table 910-1 but PAHs in compliance or with relatively low concentrations, material to be land farmed, c) High PAHs, material will be transported to the landfill.	11/14/2017
Environmental	Challenges/Limitations of Land Farming: <ul style="list-style-type: none"> <li>•Operation: Frequent (by-weekly/weekly) turning, watering material. Checking berms, etc.</li> <li>•Elevation and surroundings: Approx. 9,100 feet amsl, dense forest, tall trees: Limited sunlight.</li> <li>•Seasonal Constraint: Approx. 5 months available for effective land farming;</li> <li>•PAH concentrations (5 PAHs – 2 to more than 10 times Table 910-1). Very difficult to remediate.</li> </ul>	11/14/2017
Environmental	About 3,000 cu yards of cuttings remain on site. CPX and COGCC have discussed two options: 1) Land farming and 2) Disposal in an approved Landfill Facility. Both options have great challenges. Disposal in a landfill would require approximately 150 truck round trips (load, transport, discharge, and back to the site).	11/14/2017
Environmental	This Form 27 presents an assessment of the current cuttings condition on the 25A pad and a chronology of activities conducted since January of 2014. Treatment or disposal of the cuttings will be discussed during the Wednesday, November 8 meeting at the COGCC office in Denver.	11/02/2017

Total: 4 comment(s)