

State of Colorado Oil and Gas Conservation Commission

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Document Number:

401621714

Receive Date:

Report taken by:

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: TOP OPERATING COMPANY	Operator No: 39560	Phone Numbers Phone: (720) 6631698 Mobile: ()
Address: 3609 S WADSWORTH BLVD STE 340		
City: LAKEWOOD	State: CO Zip: 80235	
Contact Person: Paul Herring	Email: paul.herring@topoperating.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: Initial Form 27 Document #: 401621714

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 Additional testing related to alleged impacted ground water and soil |

SITE INFORMATION

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

Facility Type: LEASE	Facility ID: 10507	API #:	County Name: BOULDER
Facility Name: RIDER FAMILY TRUST #1		Latitude:	Longitude:
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NESE	Sec: 36	Twp: 3N	Range: 69W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Middle school and housing development

Is domestic water well within 1/4 mile? Yes

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:

☒ 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
UNDETERMINED	GROUNDWATER	Uncertain	Uncertain
UNDETERMINED	SOILS	Uncertain	Uncertain

INITIAL ACTION SUMMARY

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

Per discussion with the COGCC held on COGCC on April 26, 2018 at 11:00am at the COGCC headquarters building, TOP will conduct additional soil bore testing as near as practicable the same area as the alleged contaminated (based on Table 910 limits) soil bores in the Terracon report provided to the COGCC by the City of Longmont. Specifically, TOP will test the following locations documented on Exhibit 4 of the Terracon report:

SB-11 (10-12')
SB-07 (10-12')
SB-06 (8-10')

In addition, TOP will perform ground water testing on the MW-01R groundwater monitoring well.

Based on the results of these tests, TOP will consult with the COGCC on additional remediation activities, if any, to be performed.

TOP will need to receive permission from the City of Longmont in order to access the MW-01R water well as there are locks on the well preventing access.

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):

TOP will conduct additional soil bore testing as near as practicable the same area as the alleged contaminated soil bores in the Terracon report provided to the COGCC by the City of Longmont. Specifically, TOP will test the following locations documented on Exhibit 4 of the Terracon report:

SB-11 (10-12')
SB-07 (10-12')
SB-06 (8-10')

TOP will collect 3 samples from each location and 3 base samples. TOP will test for BTEX, GRO and DRO and determine if they exceed 910 limits.

Proposed Groundwater Sampling

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

TOP will perform ground water testing on the MW-01R groundwater monitoring well. TOP will test 3 samples of ground water from the well. TOP will test for BTEX and determine if the samples exceed 910 limits.

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.

Any soil removal that may be necessary will be included in a subsequent remediation plan.

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.

A remediation plan will be developed if soil and ground water contamination is found during this testing.

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.

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.

A reclamation plan may be developed based results of this testing.

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? ☐ No _____

If NO, does the seed mix comply with local soil conservation district recommendations? ☐ No _____

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). 05/01/2018

Date of commencement of Site Investigation. 05/01/2018

Date of completion of Site Investigation. 05/15/2018

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

TOP believes that the alleged contamination contained in the Terracon report needs to be verified. There have been many instances where there are discrepancy in environmental consulting reports between Terracon and our consultants. Based on a conversation with the COGCC on April 26, 2018, TOP believes immediate testing should occur in the area of the contamination. TOP would conduct the testing as soon as the plan is approved by the COGCC and permission is obtained from the surface owner (City of Longmont). If contamination is found, an additional remediation plan would be submitted to the COGCC and upon approval, executed.

In response to the NOAV issued on March 5, 2018, TOP Operating Company proposes the following next set of actions:

With the consent of the surface owner, TOP will cause the conduct of additional soil bore testing as near as practicable to the same area as the alleged contaminated (based on Table 910 limits) soil bores in the Terracon report provided to the COGCC by the City of Longmont. Specifically, TOP will cause the testing of the following locations documented on Exhibit 4 of the Terracon report:

SB-11 (10-12')

SB-07 (10-12')

SB-06 (8-10')

In addition, TOP will also cause the performance of ground water testing on the MW-01R groundwater monitoring well.

TOP will submit the testing results to the COGCC, as soon as the test results are transmitted, which it will try to complete within a period of two weeks to one month. Depending upon the results of this testing, TOP will formulate a supplemental plan, if and as needed and appropriate

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

Signed: ` Paul Herring _____

Title: Landman _____

Submit Date: ` _____

Email: paul.herring@topoperating.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: _____

Date: _____

Remediation Project Number: _____

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

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Total Attach: 0 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)