

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

401666950

Receive Date:

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Report taken by:

Jim Hughes

## 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>GUNNISON ENERGY LLC</u>           | Operator No: <u>10515</u>             | <b>Phone Numbers</b>          |
| Address: <u>1801 BROADWAY #1200</u>                    |                                       | Phone: <u>(303) 296-3549</u>  |
| City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u> |                                       | Mobile: <u>(720) 431-4108</u> |
| Contact Person: <u>Robert Downey</u>                   | Email: <u>Robert.downey@oxbow.com</u> |                               |

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 11424 Initial Form 27 Document #: 401666950

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

#### SITE INFORMATION

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

|  |                            |                               |  |
|--|----------------------------|-------------------------------|--|
| Facility Type: <u>SPILL OR RELEASE</u>         | Facility ID: <u>455150</u> | API #: _____                  | County Name: <u>GUNNISON</u>                                   |
| Facility Name: <u>Narrows Hi-vent release</u>  | Latitude: <u>39.046550</u> | Longitude: <u>-107.406600</u> |  |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |  |
| QtrQtr: <u>SENE</u>                            | Sec: <u>2</u>              | Twp: <u>12S</u>               | Range: <u>90W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |

#### SITE CONDITIONS

General soil type - USCS Classifications ML

Most Sensitive Adjacent Land Use Non crop land cattle grazing

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                            |
|-----------|----------------|-----------------------------------|---|
| No        | GROUNDWATER    | Not applicable                    | Not applicable                            |
| Yes       | SOILS          | Salt & hydrocarbons 1' below srfc | Site investigation & soil sample analysis |
| No        | SURFACE WATER  | Not applicable                    | Not applicable                            |
| Yes       | VEGETATION     | Grass & shrub die off             | Visual determination                      |

### INITIAL ACTION SUMMARY

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

Area of dead and stressed vegetation was discovered. Water line vent valve had separated likely due to ice formation. Water line was excavated, and valve was replaced and blocked as immediate response. The extent of damage was determined by third party soil sampling and visual investigation. A soil sample location map and preliminary analytical results were included as an attachment to the Supplemental Form 19 submittal.

### 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 ):

Preliminary soil samples were collected on May 17, 2018 from the impacted area. A total of five grab samples (two – analyzed for full Table 910-1; two – analyzed for Sodium adsorption ratio (SAR) and Electrical conductivity (EC); and one background sample analyzed for Table 910-1 list (minus hydrocarbons) were collected from approximately 0 to 1 feet below ground surface (ft-bgs). Results show mainly elevated SAR/EC levels within the impacted area. Elevated levels of DRO are present near the release origin. A soil sample location map and preliminary analytical results were included as an attachment to the Supplemental Form 19 submittal.

#### 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 5

Number of soil samples exceeding 910-1 4

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 2300

### NA / ND

-- Highest concentration of TPH (mg/kg) 682

-- Highest concentration of SAR 42

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 1

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 0

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l) 0

NA Highest concentration of Toluene (µg/l) 0

NA Highest concentration of Ethylbenzene (µg/l) 0

NA Highest concentration of Xylene (µg/l) 0

NA Highest concentration of Methane (mg/l) 0

### 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?

One background grab soil sample was collected outside of impacted area at an approximated depth of 0-1 feet below ground surface. The sample was analyzed for Table 910-1 minus hydrocarbons and will be referenced during final closure request. A soil sample location map and preliminary analytical results were included as an attachment to the Supplemental Form 19 submittal.

☐ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 0

Volume of liquid waste (barrels) 0

☐ Is further site investigation required?

# REMEDIAL ACTION PLAN

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soils will be removed from release area with track hoe or similar long reach excavation equipment. Stormwater controls (soil collection ditches/berms) will be placed down-gradient of the impacted area prior to source removal. Impacted soils will be disposed of at the Adobe Buttes Landfill operated by Delta County – a non COGCC facility. The cleanup will begin once disposal has been authorized by Adobe Buttes Landfill.

## 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.

Impacted soils will be removed from release area with track hoe or similar long reach excavation equipment. Stormwater controls (soil collection ditches/berms) will be placed down-gradient of the impacted area prior to source removal. Impacted soils will be removed in approximate 1 foot lifts and will either be temporarily stockpiled pending disposal transport or immediately hauled to the Adobe Buttes Landfill for disposal. The cleanup will begin once disposal has been authorized by Adobe Buttes Landfill.

After the first 1 foot lift is removed, three to four grab soil samples will be collected and analyzed for EC and SAR (where previously above the Table 910 allowable concentrations). If the results continue to exceed Table 910-1 allowable concentrations, additional 1-foot lifts will be removed, and samples collected until Table 910-1 concentrations have been reached or until the excavation has reached a depth of 3 ft-bgs, whichever occurs first. In addition, at the sample location near the release origin, TPH DRO will be analyzed until compliance with Table 910-1 concentrations has been reached.

When Table 910-1 concentrations have been achieved, the excavation will be backfilled with topsoil from GEC's topsoil stockpile area. Proper stormwater and stabilization BMPs will be installed during this reclamation phase. The area will be re-seeded with a landowner approved seed mix in the fall of 2018.

## Soil Remediation Summary

☐ In Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

☒ Ex Situ

Yes \_\_\_\_\_ Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 85

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

No \_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Land Treatment

\_\_\_\_\_ Bioremediation (or enhanced bioremediation)

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ 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.

## 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? Yes

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

No beneficial reuse is anticipated.

Volume of E&P Waste (solid) in cubic yards 85

E&P waste (solid) description Salt and hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Adobe Buttes Landfill operated by Delta County

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.

Excavation will be backfilled with topsoil located at GEC's topsoil stockpile. Erosion control measures such as straw wattles and erosion control mats will be utilized for slope stabilization. The area will be seeded with a landowner approved mix during the fall of 2018.

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? Yes

## IMPLEMENTATION SCHEDULE

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. 05/17/2018

Actual Spill or Release date, if known. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/17/2018

Date of commencement of Site Investigation. 05/17/2018

Date of completion of Site Investigation. 05/17/2018

### 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

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

Signed: Heather Lang

Title: Office Mgr & Lse Analyst

Submit Date: 06/08/2018

Email: Heather.lang@oxbow.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: Jim Hughes

Date: 06/12/2018

Remediation Project Number: 11424

### COA Type

### Description

|  |   |
|--|---|
|  | Waste manifests shall be attached to a supplemental Form 27 confirming volume and facility where impacted material was disposed of.   |
|  | Horizontal and vertical extent of impacted area shall be determined and documented in a supplemental Form 27, per Rule 910.b.3.   |
|  | Any information that the operator has available concerning failure analysis, integrity/pressure testing, and any data concerning the root causes of the spill shall be provided on a supplemental spill report. Provide all pipeline integrity data to the COGC Pipeline Supervisor, Mark Schlagenhauf, at (303) 894-2100 x5177 or mark.schlagenhauf@state.co.us. |

### 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

|           |                           |
|-----------|---------------------------|
| 401666950 | FORM 27-INITIAL-SUBMITTED |
|-----------|---------------------------|

Total Attach: 1 Files

### General Comments

### User Group

### Comment

### Comment Date

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

Total: 0 comment(s)