

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

Steven Arauza

## 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: CPX PICEANCE HOLDINGS LLC	Operator No: 10639	<b>Phone Numbers</b>
Address: 34 S WYNDEN DR STE 240		
City: HOUSTON State: TX Zip: 77056		
Contact Person: Nick Kurtenbach	Email: nick@cpxpiceance.com	
		Phone: (713) 554-9031
		Mobile: ( )

### 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.

The second lift of soil is currently landspread, and did not pass lab analysis for PAHs. The remaining soil pile is on location. Stormwater BMPs are in effect for the soil pile and any landspreading (see attached diagram).

### 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 ):

The soil pile consisting of cuttings/mud mixed with sawdust is being addressed. The pile will be spread on location in a "horseshoe" shape at a depth between 2 and 2.5 feet deep. Efforts will be made not to mix the pile. The pile will be divided into 10 cells consisting of approximately 300 cubic yards of material for each cell. A composite soil sample with 5 discrete points will be collected from each cell. Each discrete point will be measured by a hand held GPS. The 10 composite samples will be laboratory analysed for TPH-DRO and PAHs at an accredited laboratory, upon land-spreading (approximately June 1, 2018).

The current landspread soil will be re-sampled for TPH-DRO and PAHs at the same time.

#### 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

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.

Initial soil samples will be collected from the spread soil pile approximately June 1, 2018 and the current land spread will be re-sampled. Laboratory analytical results will be reviewed for the 12 composite soil samples. Cells where PAH concentrations are below Table 910-1 levels will be stockpiled for re-use.

## 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.

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.

Second part of proposed remediation summary - Soil cells exhibiting PAH concentrations exceeding Table 910-1 up to 2X Table 910-1 will be land treated (June 2018 sampling). The soil will be thin spread (1 foot to 18 inch) and turned every two weeks through the Fall. Enhanced bioremediation will be utilized to reduce hydrocarbons. Soil samples will be collected in October 2018 and analyzed for any individual Table 910-1 constituent exceedance from the previous sampling event.

## 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) \_\_\_\_\_ 0  
Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_  
Yes \_\_\_\_\_ Excavate and onsite remediation  
Yes \_\_\_\_\_ Land Treatment  
Yes \_\_\_\_\_ 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.

It is not anticipated that groundwater is impacted as the pad surface has been compacted to create an impervious layer prior to treatment cell being constructed. Should impacts be discovered during the treatment process, a separate groundwater monitoring plan will be submitted outlining the details.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Monthly starting June 2018

**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. Currently there is a stockpile on location consisting of Cells 1/9/10/12 that satisfy COGCC table 910-1.

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: Greenleaf and Garfield County have approved the waste.

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

E&P waste (liquid) description \_\_\_\_\_

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

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

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

Do all soils meet Table 910-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

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? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

## 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. A Rule 502b variance is in progress for Rule 1003b.

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? \_\_\_\_\_

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. 06/01/2018

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

### SITE RECLAMATION DATES

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

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

### OPERATOR COMMENT

Below is a status update of the landfarming progress at the CPX TPR 25A location.

A composite sample was collected from the individual cells (Cells 2/3/4/5/6/7/8/11) as well as the stockpiled material, and analyzed for full COGCC Table 910-1 on 8.9.18. Cell layout map is provided in Doc# 401476546.

The stockpiled material that previously passed PAH/DRO analysis from the 6.21.18 sampling event was re-sampled by collecting four (4) individual 5-point composite samples from various depths and intervals and analyzing them for full COGCC Table 910-1.

Below is a summary of the sampling events:

Initial sampling event on 6.21.18 indicated the following:

Cells 1/9/10/12 – Satisfy COGCC Table 910-1 for PAH and DRO

Cells 2/3/4/5/6/7/8/11 – Exceeded for PAH

Follow-up sampling on 8.9.18 indicated the following:

Cells 1/9/10/12 (stockpile) – Satisfy COGCC Table 910-1 (full list)

Cells 2/3/4/5/6/7/8/11 – Full 910-1 list analyzed, only exceedance are within select PAH analytes. The PAH analysis from the 8.9.2018 sample event showed a reduction of up to 50% from the initial samples collected on 6.21.18.

Landfarming operations are going to be enhanced by utilizing a specific blend of bioremediation, soil amendments, nutrients, and fertilizers used to increase the bioremediation process. Tilling of the material will occur on a weekly basis. Treated water from the TePee Park CFF will be applied during, and in between tilling to keep microbe activity at peak performance.

Upon successful completion the land-farmed cuttings, material will be utilized on-location and used in interim reclaim.

Stockpiled material from cells 1/9/10/12 located in the north/northwest corner satisfy COGCC Table 910-1 and will be utilized as fill material in the interim reclaim activities on site.

Application of the bioremediation product is anticipated to be completed between Sept. 17-28 with follow-up sampling during Oct 8-12. Samples will be collected from the cells that exceeded PAH thresholds, and analyzed for the individual PAH constituent that exceeded in the 8/9/18 sampling event, as all other constituents satisfy COGCC Table 910-1 (with the exception to arsenic, which are comparable to background levels).

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

Signed: ` Kris Rowe \_\_\_\_\_

Title: HRL Compliance Solutions \_\_\_\_\_

Submit Date: ` 09/07/2018 \_\_\_\_\_

Email: krowe@hrlcomp.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: Steven Arauza \_\_\_\_\_

Date: 09/28/2018 \_\_\_\_\_

Remediation Project Number: 10737 \_\_\_\_\_

### COA Type

### Description

As the pit fluid contents indicate the presence of BTEX, these constituents in addition to TPH-DRO and TPH-GRO shall be analyzed for when collecting samples to monitor the effectiveness of the land treatment.

	<p>It is stated that, "Treated water from the TePee Park CFF will be applied during, and in between tilling to keep microbe activity at peak performance."</p> <p>TePee Park CFF is Pit Facility ID: 416339, an active pit slated for closure.</p> <p>Prior to applying fluids from Pit Facility ID: 416339 to the land treatment area, the Operator shall prepare and a 907.a.(3) waste management plan for COGCC review and approval. Approval of the plan by the COGCC is required prior to fluid application. At a minimum, the plan shall include: specific details of sampling the fluids, details in the application of the fluids, details in monitoring the effectiveness of the fluid application and degradation of constituents of concern, and surface owner approval of where fluids would be applied or a statement that the Operator is the surface owner.</p>
	<p>If analytical results from October sampling events do not meet Table 910-1 standards, operator shall devise an alternate plan for remediation and/or cuttings disposal.</p>
	<p>Supplemental eForm 27 #401539090 included COA that "All compliant material shall be beneficially reused within 30 days of meeting Table 910-1. Analytical data attached to this report indicates that material stockpiled from cells 1, 9, 10, &amp; 12 meets Table 910-1 with the possible exception of Arsenic. Lab Report dated 8/21/2018.</p> <p>The Operator may request relief from this COA, and shall provide a time frame for when the material will be beneficially used.</p>

### **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.

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
401757017	FORM 27-SUPPLEMENTAL-SUBMITTED
401757038	ANALYTICAL RESULTS
401757045	ANALYTICAL RESULTS

Total Attach: 3 Files

### **General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental Data	Initial eForm 27 #401448130 included comment that CPX and COGCC discussed plan to dispose of High PAH material in landfill, though disposal was estimated to involve ~150 truck trips.	09/13/2018
Environmental	Material from cells 1, 9, 10, & 12 stockpiled on location currently. Materials with PAH exceedances from cells 2-8 & 11 re-spread over 10 land treatment cells for treatment application in mid-September to be re-sampled in October.	09/13/2018

Total: 2 comment(s)