

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:
ROB YOUNG

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: <u>H & M PETROLEUM CORPORATION</u>	Operator No: <u>10032</u>	Phone Numbers
Address: <u>PO BOX 467</u>		Phone: <u>(713) 632-4565</u>
City: <u>SIDNEY</u>	State: <u>NE</u>	Zip: <u>69162</u>
Contact Person: <u>Dick Shanor</u>	Email: <u>dick.shanor@gmail.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 12191 Initial Form 27 Document #: 401864132

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

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

Facility Type: <u>PIT</u>	Facility ID: <u>267957</u>	API #: _____	County Name: <u>LOGAN</u>
Facility Name: <u>CATHERINE #1</u>	Latitude: <u>40.970214</u>	Longitude: <u>-103.469472</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>36</u>	Twp: <u>12N</u>	Range: <u>55W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Unnamed narrow wash approximately 350 feet to the east

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

domestic water well approximately 1,000 feet to the north, narrow wash of Sand Canyon approximately 1,000 feet to the west-northwest

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	21'x21' & 15'x25'	excavation and soil sampling

INITIAL ACTION SUMMARY

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

Visually impacted soils have been excavated from the production pit and stockpiled on site. The adjacent skim tank has been removed from the skim pit.

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):

Five surficial soil samples (SS01 through SS05) were collected from within the production pit at approximately 45-foot centers. Two soil borings were also advanced in the production pit. One soil sample was collected from each soil boring at refusal (SS06@6' and SS08@6'). One soil sample was collected from the floor of adjacent skim pit (B01). The 4 sidewalls of the skim pit were field-screen with a PID. The sidewall with the most impacts (PID, olfactory, and visual) was also sampled (E01). All soil samples were submitted for BTEX, DRO, GRO, ORO, EC, and pH analysis. Where EC exceeded Table 910-1 standards, SAR was also analyzed. Based on laboratory results, excavation activities were conducted in the vicinity of sil samples SS03 and E01. Confirmation soil samples were collected from these excavations and submitted for BTEX, DRO, GRO, and ORO analysis. The soil sample locations are depicted on the attached Figure 1.

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):

The stockpiled soil was characterized per the City of Kimball Landfill's requirements.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 12

Number of soil samples exceeding 910-1 4

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

Approximate areal extent (square feet) 816

NA / ND

-- Highest concentration of TPH (mg/kg) 18930

-- Highest concentration of SAR 9.55

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 6

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) 240

Volume of liquid waste (barrels) 0

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.

All soil with elevated BTEX and TPH concentrations has been excavated and hauled to the City of Kimball Landfill for disposal.
Soil with elevated EC concentrations have SAR values less than Table 910 standards.
Soil with pH values outside Table 910 standards will be buried at a depth greater than 3 feet (below the root zone) once the production pit is filled back in and the site is recoultured to match pre-existing conditions.

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.

Excavation activities were conducted on January 15, 2019. Approximately 240 cubic yards of impacted soil were hauled to the City of Kimball Landfill for disposal.

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) _____ 240
- _____ 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.

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:

None

Volume of E&P Waste (solid) in cubic yards _____ 240

E&P waste (solid) description impacted soil _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: City of Kimball Landfill (NDEQ Permit # NE0202653) _____

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

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? No _____

Do all soils meet Table 910-1 standards? No _____

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? Yes _____

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.

Once the production pit and skim pit are approved for closure, the site will be reclaimed in accordance with COGCC Rules. The berm material from the Production Pit and Skim Pit will be buried at a depth of greater than 3 feet bgs.

During the reclamation, the vegetation/weeds observed during the 8-13-18 inspection (Document #688000182) will be addressed.

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). 12/03/2018
 Date of commencement of Site Investigation. 12/10/2018
 Date of completion of Site Investigation. 12/10/2018

REMEDIAL ACTION DATES

Date of commencement of Remediation. 12/10/2018
 Date of completion of Remediation. 01/16/2019

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____
 Date of completion of Reclamation. _____

OPERATOR COMMENT

The berm for the Production Pit is minimal. The size of the Production Pit is will allow the berm material to be buried at depths greater than 3 feet bgs.

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

Signed: Chris Roy Title: Environmental Consultant
 Submit Date: 02/01/2019 Email: CRoy@LTEEnv.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: ROB YOUNG Date: 02/07/2019

Remediation Project Number: 12191

COA Type

Description

	The pit berm material can be used to backfill the pit, ensure that soil impacted with pH, EC and SAR concentrations greater than Table 910-1 allowable levels are covered with a minimum of three feet of clean cover fill.
	Unchecked "final closure request" due to COA for berm footprint inorganic sampling not being completed.

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

401926263	FORM 27-SUPPLEMENTAL-SUBMITTED
401926264	DISPOSAL MANIFESTS

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)