

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

401913807

Receive Date:

04/09/2019

Report taken by:

ALEX FISCHER

## 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>ROBERT L BAYLESS PRODUCER LLC</u>	Operator No: <u>6720</u>	<b>Phone Numbers</b> Phone: <u>(505) 3262659</u> Mobile: <u>(505) 3266911</u>
Address: <u>P O BOX 168</u>		
City: <u>FARMINGTON</u>	State: <u>NM</u> Zip: <u>87499</u>	
Contact Person: <u>HELEN TRUJILLO</u>	Email: <u>NOTICES@RLBAYLESS.COM</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 13146Initial Form 27 Document #: 401913807

#### 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>101750</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PHILADELPHIA CREEK 43</u>		Latitude: <u>39.935309</u>	Longitude: <u>-108.729720</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SENE</u>	Sec: <u>28</u>	Twp: <u>1S</u>	Range: <u>101W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications OHMost Sensitive Adjacent Land Use RANGELANDIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? NoIs 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	SOILS	NONE	SOIL TEST

### INITIAL ACTION SUMMARY

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

NONE

### 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 ):

BLOWDOWN PIT WAS SAMPLED IN 2012 AND PIT WAS NEVER USED. SUBMITTED RESULTS TO COGCC IN 2013 BUT WAS NEVER PROCESSED. PLEASE SEE "RELATED FORMS".

#### 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 0  
Was the areal and vertical extent of soil contamination delineated?             
Approximate areal extent (square feet) 100

### NA / ND

ND Highest concentration of TPH (mg/kg)             
-- Highest concentration of SAR 20.2  
BTEX > 910-1 Yes  
Vertical Extent > 910-1 (in feet) 3

### 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?

Sampling was conducted in 2013 from the bottom of the pit at a depth of 1.5ft below ground surface (bgs) from the bottom of the pit. Sample results indicate that soils satisfied COGCC Table 910-1 with the exception of inorganics and arsenic. Bayless is requesting consideration to arsenic as outlined in the COGCC FAQ #31 due to concentrations being comparable to background levels. Bayless is also requesting consideration to SAR as the pit will be backfilled with 3ft of native cover as outlined in COGCC FAQ #32.

☐ 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.

SOIL TESTED WITHIN TABLE 910-1 PARAMETERS.

## 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.

NONE

## 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.

WILL RECONTOUR AND RESEED PER BLM SPECIFICATIONS WEATHER-PERMITTING IN SPRING 2019. ATTACHED IS THE BLM APPROVED RECLAMATION PLAN.

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. \_\_\_\_\_

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/26/2012

Date of commencement of Site Investigation. \_\_\_\_\_

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. 02/15/2019

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

**OPERATOR COMMENT**

WE ARE NEEDING PIT ID 101750 CLOSED IN THE COGCC DATABASE SO WE CAN RECLAIM SITE WEATHER PERMITTING. PLEASE SEE ALL RELATED FORMS AND ATTACHMENTS.

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

Signed: HELEN TRUJILLO

Title: OFFICE MANAGER

Submit Date: 04/09/2019

Email: NOTICES@RLBAYLESS.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: ALEX FISCHER

Date: 04/09/2019

Remediation Project Number: 13146

**COA Type****Description**

	Reclamation shall be in accordance with the BLM approved plans.
	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. Inorganic exceedances shall be addressed at the time of reclamation. If future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if surface and/or ground water is found to be impacted, then further investigation and/or remediation activities will be required at the site.

**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**

401913807	FORM 27-INITIAL-SUBMITTED
401915469	RECLAMATION PLAN
401915470	RECLAMATION PLAN
401915505	ANALYTICAL RESULTS
402001453	OTHER
402001456	OTHER

Total Attach: 6 Files

**General Comments****User Group****Comment****Comment Date**

Environmental	Closure request on future Pit Facilities shall include a map depicting locations of soil samples collected from the pit and an explanation of Pit Bottom (ETC) and Pit Bottom (BAY).	04/09/2019
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Total: 1 comment(s)