

# State of Colorado Oil and Gas Conservation Commission

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402067472

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Report taken by:

John Heil

## 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: TEP ROCKY MOUNTAIN LLC	Operator No: 96850	<b>Phone Numbers</b> Phone: (970) 263-2760 Mobile: (970) 623-4875
Address: PO BOX 370		
City: PARACHUTE	State: CO Zip: 81635	
Contact Person: Michael Gardner	Email: MGardner@terraep.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 13721

Initial Form 27 Document #: 402067472

#### 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: PIT	Facility ID: 374696	API #: _____	County Name: GARFIELD
Facility Name: JOLLY 16-23D		Latitude: 39.529489	Longitude: -107.563782
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: SWNW	Sec: 16	Twp: 6S	Range: 91W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications OH

Most Sensitive Adjacent Land Use Pasture/farmland  
@ 2020ft to the east with an elevation difference of 754ft

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

#### Other Potential Receptors within 1/4 mile

Garfield Creek lies approximately 3075ft to the east and an unnamed ephemeral drainage lies approximately 3700ft to the west.

## 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 checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             |  |
| <input 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
UNDETERMINED	SOILS	TBD	field screening, confirmation 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.

At the location(s) of the pit which are the furthest downgradient, lowest in elevation and/or have the potential for pooling of liquid, field-screening will be performed and will utilize appropriate field equipment which may include, but is not limited to the following.  
-PetroFlag unit,  
-photoionization gas detector (PID),  
Confirmation sample(s), Rule 905.b.(4), will be collected and submitted for lab analysis and verification to confirm compliance with Rule 910 and Table 910-1, relative to the aforementioned field screen activity. Other areas of the pit walls and floor will be inspected for evidence of impact via field screening and visual observation. Grab samples will be collected, as appropriate, to demonstrate diligence and thoroughness of investigation activities performed as directed in Rule 905.b.(1). In addition, all field screening activities and results will be documented and compiled into a summary report, table and/or map to be provided with the Notice of Completion (NOC) Report. Grab sample(s) will be submitted for laboratory analysis to confirm field screening activities. Sub-liner sample analytes will include considerations identified by Rule 910 and all contaminants of concern for soils from Table 910-1.

### 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 (5) grab samples will initially be collected from the pit subsoils along the side walls at a point positioned center and off the bottom at the lowest point of the pit. Sample locations will be provided in a sample location map attached to the closure summary. Any additional identified areas of concern will be sampled independently for TPH/BTEX for initial concentrations.

#### Proposed Groundwater Sampling

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

Five (5) grab samples will initially be collected from the pit subsoils along the side wall and bottom. Sample locations will be provided in a sample location map attached to the closure summary.

#### 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) 0

### NA / ND

-- Highest concentration of TPH (mg/kg) 0

-- Highest concentration of SAR 0

BTEX > 910-1           

Vertical Extent > 910-1 (in feet) 0

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 92'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

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

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?

☐ 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.

Impacted soils will be excavated using heavy equipment, and then soils will either be land-farmed on site, or taken to an approved commercial disposal facility for offsite disposal.

## 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.

The extent of contamination will be determined through excavation and sampling until COGCC cleanup standards are achieved. Impacts to ground water resources are not expected at this time, but will be assessed during remedial activities.

Contaminated soils, depending on volume, will either be land-farmed and treated onsite with a microbial agent to enhance the bio-degradation of hydrocarbons in soil. Treatment would begin immediately and would continue until such a time that subsequent sampling shows that the soils can meet COGCC cleanup standards. If soils cannot be land-farmed, they will be hauled offsite to a commercial disposal facility that is permitted to accept E&P wastes.

## 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 # \_\_\_\_\_  
No \_\_\_\_\_ Excavate and onsite remediation  
No \_\_\_\_\_ Land Treatment  
No \_\_\_\_\_ Bioremediation (or enhanced bioremediation)  
No \_\_\_\_\_ 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.

Groundwater impacted are not suspected at this time. The nearest ground water well (Permit # 234309) indicates static water levels are at 92ft.

## 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.

The pit will be reclaimed to the present grade of the location or to the approximate original contour of the landscape and consistent with the 1000-series Rule. Seeding of the disturbed area will be performed in accordance with its' intended use. The seed mix will be prescribed by the landowner. There are no known noxious weeds in the immediate area of the disturbance.

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). \_\_\_\_\_

Date of commencement of Site Investigation. 06/24/2019 \_\_\_\_\_

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. \_\_\_\_\_

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

**OPERATOR COMMENT**

TEP is submitting this Initial Form 27 for the closure of the KP 22-16 production pit (Facility ID 374696). It is anticipated that closure activities will start and finish during the summer of 2019.

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

Signed: Michael Gardner

Title: TEP Env.

Submit Date: 06/07/2019

Email: MGardner@terraep.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: John Heil

Date: 06/11/2019

Remediation Project Number: 13721

**COA Type****Description**

	Land Treatment of oily waste shall be performed in strict accordance with the requirements of COGCC Rule 907.e.(2).
	Operator indicates that groundwater samples be collected as part of this investigation and states that:  "Five (5) grab samples will initially be collected from the pit subsoils along the side wall and bottom. Sample locations will be provided in a sample location map attached to the closure summary."  Please clarify.

**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**

402067472	FORM 27-INITIAL-SUBMITTED
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Total Attach: 1 Files

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

Environmental	Additional samples at the base of the pit may be required to fully delineate impacts to soil or groundwater.	06/10/2019
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Total: 1 comment(s)