

# State of Colorado Oil and Gas Conservation Commission

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08/29/2019

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: CAERUS PICEANCE LLC		Operator No: 10456	<b>Phone Numbers</b>	
Address: 1001 17TH STREET #1600		Phone: (970) 285-2925		
City: DENVER	State: CO	Zip: 80202		Mobile: (970) 640-6919
Contact Person: Blair Rollins		Email: brollins@caerusoilandgas.com		

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 7167 Initial Form 27 Document #: 2229808

#### PURPOSE INFORMATION

- |  |  |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input checked="" 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 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: 285021	API #: _____	County Name: GARFIELD
Facility Name: NP EF07B N30 595		Latitude: 39.581253	Longitude: -108.098522
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: SESW	Sec: 30	Twp: 5S	Range: 95W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications MH Most Sensitive Adjacent Land Use RANGELAND

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

According to COGCC GIS Online mapping, there is one stream and one water well 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	GROUNDWATER	40' by 50'	Laboratory analytical results
Yes	SOILS	40' by 100' by 30'	Laboratory analytical results

### INITIAL ACTION SUMMARY

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

Please refer to COGCC Document number 400786267.

### 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 ):

Caerus does not plan to conduct soil boring and sampling as part of the solar powered oil skimmer pilot test.

#### Proposed Groundwater Sampling

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

Caerus does not plan to conduct groundwater sampling as part of the solar powered oil skimmer pilot test.

#### Proposed Surface Water Sampling

☐ Will surface water samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

Surface water samples are collected down gradient from this location on a quarterly basis for Caerus' North Parachute Ranch water sampling program.

### Additional Investigative Actions

☒ Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

Caerus plans to determine the recovery and effectiveness of oil skimming from the monitoring wells around the site which have free-phase oil present.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 82

Number of soil samples exceeding 910-1 31

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 12500

### NA / ND

-- Highest concentration of TPH (mg/kg) 13450

-- Highest concentration of SAR 46

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 52

### Groundwater

Number of groundwater samples collected 77

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 45

Number of groundwater monitoring wells installed 7

Number of groundwater samples exceeding 910-1 2

-- Highest concentration of Benzene (µg/l) 1.4

-- Highest concentration of Toluene (µg/l) 7.1

-- Highest concentration of Ethylbenzene (µg/l) 6.6

-- Highest concentration of Xylene (µg/l) 11

NA 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?

Following results of the pilot test, Caerus plans to implement an upgraded remediation strategy for the impacted soil and groundwater found within the pit boundary at the N30 pad.

# REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes \_\_\_\_\_

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Caerus proposes to conduct a pilot test to determine the effectiveness of free-phase oil recovery from existing groundwater monitoring wells in the area of the historic pit. Caerus will temporarily install solar-powered belt skimmers to remove oil from the surface of groundwater at the site. Based on the results of the pilot test, Caerus will determine plans for remediation of the impacted soil and groundwater moving forward.

## 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.

Caerus plans to complete a pilot test of two solar-powered belt skimmers on monitoring wells with free-phase oil present on the surface of the groundwater. Once the results of the pilot test have been reviewed, Caerus plans to use these results to implement an upgraded remediation strategy for the impacted soil and groundwater found within the pit boundary at the N30 pad.

## Soil Remediation Summary

☒ In Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
Yes \_\_\_\_\_ Air sparge / Soil vapor extraction  
Yes \_\_\_\_\_ 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

Yes \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
☐ \_\_\_\_\_ Chemical oxidation  
☐ \_\_\_\_\_ Air sparge / Soil vapor extraction  
☐ \_\_\_\_\_ Natural Attenuation  
Yes \_\_\_\_\_ Other \_\_\_\_\_ Mechanical removal using belt skimmer \_\_\_\_\_

## 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 remediation and monitoring wells were installed by the previous operator. Caerus proposes to utilize two solar-powered belt skimmers as a pilot test to determine the feasibility for removal of free phase hydrocarbons found on the surface of the groundwater. Caerus will install the skimmers in the first part of September 2019 and utilize them until the winter. Caerus will provide the results of the skimming activities in a supplemental Form 27 to determine remedial actions moving forward.

## 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: \_\_\_\_\_

## 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.

The footprint for the backfill pit occurs within the pad boundary for this location. During reclamation the backfill pit may be part of the pad's working surface and/or covered by recontoured and reseeded sloped installed to meet reclamation objectives. Interim and final reclamation activities will be carried out in accordance with COGCC 1000 Series requirements, and will be documented accordingly.

Is the described reclamation complete? \_\_\_\_\_

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). 09/04/2019

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

Date of completion of Site Investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 08/08/2012

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

### **SITE RECLAMATION DATES**

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

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

**OPERATOR COMMENT**

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

Signed: Blair Rollins

Title: EHS Specialist

Submit Date: 08/29/2019

Email: brollins@caerusoilandgas.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: 11/01/2019

Remediation Project Number: 7167

**COA Type****Description**

	Provide status update for the oil skimmer pilot test via a Supplemental eForm 27 by January 31, 2020.
	Operator's Supplemental eForm 27 shall include the attachments listed below. 1) A remediation project summary report that summarizes remediation efforts conducted to date: SVE system operation/decommission, Enhanced Fluid Recovery/Multiphase Extraction operations, dewatering operations, delineation of impacts to soil and groundwater, and sampling events as well as remediation efforts that have taken place from June 2017 to present.  2) Complete analytical summary tables for soil and groundwater sampling events conducted over the duration of remediation operations.  3) Complete laboratory reports and sample location diagrams for soil and groundwater events conducted by Caerus Piceance LLC for this remediation project.

**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**

402160423	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)