

State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402261151

Receive Date:

01/29/2020

Report taken by:

KRIS NEIDEL

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>WESCO OPERATING INC</u>		Operator No: <u>95520</u>	Phone Numbers Phone: <u>(307) 577-5329</u> Mobile: <u>()</u>
Address: <u>120 S DURBIN STREET</u>			
City: <u>CASPER</u>	State: <u>WY</u>	Zip: <u>82602</u>	
Contact Person: <u>Dave Weineert</u>		Email: <u>davew@kirkwoodcompanies.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11554Initial Form 27 Document #: 401676452

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>116704</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>GOVERNMENT TRELEAVEN TB</u>		Latitude: <u>40.337308</u>	Longitude: <u>-108.091890</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSW</u>	Sec: <u>32</u>	Twp: <u>5N</u>	Range: <u>95W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use WoodlandIs 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) Pit Soils

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	Pit Contaminated Soils	Sample Result

INITIAL ACTION SUMMARY

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

Samples were taken inside of pit area to determine the extent of impact.

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):

Soils have been excavated from the pit area as to remove contaminated soils. Soil samples for closure were collected under the direction of COGCC on 7/30/2019 (submitted to COGCC on 10/11/2019) and 11/13/2019 (results included with this Form 27S). Based on the combined results of these two sampling events and COGCC previously approved SAR and EC waiver and documented background arsenic concentrations, Wesco is requesting approval to backfill the former pit location with no further excavation or sampling required.

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 4

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 2700

NA / ND

-- Highest concentration of TPH (mg/kg) 162

-- Highest concentration of SAR 55.5

BTEX > 910-1 No

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)

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?

soil sample collected for background analysis.

☐ 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.

Wesco Operating has removed additional material within the Treleaven pit area and has conducted additional sampling.

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.

Wesco Operating has removed additional material within the Treleaven pit area and has conducted additional sampling that shows the pit area meeting COGCC standards. Wesco Operating requests approval to close the pit area by backfilling with clean soils and recontouring the surrounding area to meet grade.

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) _____ 2000

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

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.

N/A

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 1475

E&P waste (solid) description soil - see notes section at end of
submittal for explanation of volume

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Wray Gulch Landfill, Meeker, CO

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? Yes _____

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? No _____

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.

Wesco Operating has removed additional material within the Treleaven pit area and has conducted additional soil sampling that demonstrated that the soil in the pit area meeting COGCC standards. The basis for this has been determined through analytical results (see attached) that meets 910-1 table standards, COGCC FAQ #32 which states that any EC and SAR exceedances below 3 feet are waived, and COGCC's prior approval to waive the arsenic exceedance since background samples taken by Wesco Operating show elevated levels of arsenic in the surrounding area. See prior Form 27's for additional sampling information and waivers given by COGCC Kris Neidel. Wesco Operating requests approval to close the pit area by backfilling with clean soils and recontouring the surrounding area to meet grade. Most recent soil sampling was conducted under the supervision of Kris Neidel, COGCC.

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? No _____

If NO, does the seed mix comply with local soil conservation district recommendations? No _____

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). 08/03/2018

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 07/08/2019

Date of completion of Remediation. 11/13/2019

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Based on previously submitted soil analysis, the attached soil analytical results, soil location map and waivers of sampling given to Wesco Operating by COGCC staff for arsenic, EC, and SAR (see FAQ 31 and 32), Wesco Operating is requesting no further sampling or excavation be required at the Treleven pit and that Wesco Operating be allowed to continue to close the pit by backfilling with clean soils and recountouring the pit to the surrounding area.

For the E&P waste volume, our actual disposal volume based on landfill tickets was 1,494 tons. Because the forms requires units in cubic yards, this weight was translated to estimated cubic yards using an assumed conversion of 75 pounds per cubic foot.

Per 2008 rule making FAQ question 31 and data previously presented Arsenic values are considered consistent with background values.

No groundwater was encountered during excavation work. No groundwater samples were collected during this work.

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

Signed: Dave Weinert

Title: HSE Coordinator

Submit Date: 01/29/2020

Email: Davew@kirkwoodcompanies.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: KRIS NEIDEL

Date: 02/25/2020

Remediation Project Number: 11554

COA Type**Description**

	Based on review of the information provided, it appears that no further action is necessary at this time and COGCC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.
	Pit 116704 is closed in the COGCC database as a result of data presented here.
	It was stated in document 402261151 that all SAR exceedances are below 3 feet of final grade. After review of the data presented, elevated levels of [SAR/EC/pH] exist deeper than three feet below ground surface. Per guidance in FAQ 32, elevated levels of [SAR/EC/pH] at three feet below ground surface or deeper should not adversely affect the successful reclamation of the site. If groundwater is found to be impacted, or if reclamation is not compliant with the 1000-series rules, additional remediation activities may be required at the site. It appears that no further action is necessary at this time and COGCC approves the closure request.
	Final reclamation should comply with COGCC 1000 series rules. Consult with COGCC Reclamation Staff and BLM reclamation staff for final reclamation planning. Lou Colby can be reached at; (970) 989-4402 (cell) and lou.colby@state.co.us.

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**

402261151	FORM 27-SUPPLEMENTAL-SUBMITTED
402261204	ANALYTICAL RESULTS
402274927	MAP

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)