

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:

402411100

Receive Date:

06/02/2020

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: THUNDER RIVER PRODUCTION LLC	Operator No: 10468	Phone Numbers Phone: (713) 777-6400 x7001 Mobile: (713) 444-3082
Address: 4545 POST OAK PLACE DR #240		
City: HOUSTON	State: TX Zip: 77027	
Contact Person: John Stevens	Email: john.stevens@thunder-river.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 6938 Initial Form 27 Document #: 2223729

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 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 checked="" type="checkbox"/> Other to provide an update on plan to resolve previous Operators outstanding issues related to REM 6938 |

SITE INFORMATION

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

Facility Type: WELL	Facility ID:	API #: 057-06483	County Name: JACKSON
Facility Name: Fuqua 19-02-10-1H		Latitude: 40.484650	Longitude: -106.184710
		** correct Lat/Long if needed: Latitude:	Longitude:
QtrQtr: SWSE	Sec: 18	Twp: 6N	Range: 78W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

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

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

Monroe Ditch is .15 miles away

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 checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" 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
	SOILS	~200 FT BY 450 FT	VISUALLY, SAMPLES, TAPE MEASURE/GPS
	VEGETATION	~200 FT BY 450 FT	VISUALLY, SAMPLES, TAPE MEASURE/GPS

INITIAL ACTION SUMMARY

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

LARAMIE ENERGY II SCRAPED UP ~20 CU YDS OF IMPACTED SAGE BRUSH AND SOIL IN CONTAINMENT NEAR THE VERTICAL SEPARATOR WHERE THE RELEASE OCCURRED. THE ORIGINAL PLAN WAS TO BURN THE IMPACTED AREAS, SCARIFY THE SOIL, AND RE-SEED WITH NATIVE GRASSES AND SAGE BRUSH. A FIRE BREAK WAS CUT AROUND THE PERIMETER OF THE IMPACT AREA IN PREPARATION FOR A CONTROLLED BURN. HOWEVER, A COUNTY WIDE BURN BAN WAS IMPLEMENTED TWO DAYS BEFORE THE CONTROLLED BURN WAS TO TAKE PLACE.

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):

We will take soil samples of the sites SS11 and SS17 as referenced in documents 2231635 and 2231634 for testing that are the culprits keeping REM 6938 open from the previous Operators submissions from 2012 and 2013

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 _____ 0

Number of soil samples exceeding 910-1 _____

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

Approximate areal extent (square feet) _____

NA / ND

_____ Highest concentration of TPH (mg/kg) _____

_____ Highest concentration of SAR _____

_____ BTEX > 910-1 _____

_____ Vertical Extent > 910-1 (in feet) _____

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) _____

Volume of liquid waste (barrels) _____

☒ Is further site investigation required?

SEE ATTACHED MAP AND ANALYTICAL RESULTS.

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.

THE RELEASE AREA WILL BE FENCED WITH 3-STRAND BARBWIRE TO PREVENT CATTLE AND WILDFIRE FROM ENTERING THE IMPACT AREA. LARAMIE ENERGY II WILL HIRE A CONTRACTOR TO SPRAY SURFACTANT AND NUTRIENTS OVER THE IMPACT AREA USING A TRACTOR AND A BOOM. ADDITIONAL SOIL SAMPLES WILL BE COLLECTED 3 MONTHS AFTER APPLICATION. IF THE IMPACTED SOILS HAVE NOT MET THE COGCC TABLE 910-1 STANDARDS AND THE BURN BAN IS LIFTED, BURNING THE IMPACTED VEGETATION AND/OR SECOND APPLICATION WILL BE EVALUATED FOLLOWING RECEIPT OF SOIL ANALYTICAL RESULTS.

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.

N/A

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.

BASED ON A REVIEW OF DWR RECORDS FOR PERMITTED WATER WELLS IN THE AREA THERE ARE NO WATER WELLS LOCATED WITHIN SECTION 18. ONE PERMITTED WELL WAS IDENTIFIED IN SECTION 20, WITH A TOTAL DEPTH LISTED AT 100 FEET. THERE ARE NO PERMITTED WATER WELLS IN THE IMMEDIATE DOWNGRAIENT DIRECTION (NW) OF TEH FUQUA 18-15 WELL PAD, AND THE RELEASE WAS DIRECTED TO THE EAST, OR AWAY FROM THE CLOSEST SURFACE WATER (MONROE-OTTAWA DITCHES) AND THE ILLINOIS RIVER. GROUNDWATER IS NOT EXPECTED TO BE IMPACTED BASED ON THE REPORTED GROUNDWATER DEPTH (50 FT TO 100 FT) AND NATURE OF THE RELEASE.

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? _____

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: _____

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? _____

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.

SURFACE SOIL SAMPLES WERE COLLECTED ON 4/26/2012 FROM THE SPILL AREA TO ASSESS CURRENT SITE CONDITIONS AND TO DEFINE THE NATURE AND EXTENT OF THE IMPACTED AREA. THE CONDENSATE/CRUDE OIL IMPACTS ARE SURFICIAL SINCE THE RELEASE WAS FROM THE TOP OF A VERTICAL SEPARATOR. NEW GRASSES WERE OBSERVED TO HAVE GERMINATED AND CACTI AND FORBS WERE OBSERVED FLOWERING WITHIN THE IMPACT AREA AT THE TIME OF THE SAMPLING. USING A SURFACTANT TO BREAK DOWN THE PARAFIINS ON THE VEGETATION AND ADDITION OF NUTRIENT TO ENHANCE BIODEGRADATION IN THE SOIL HAS ADVANTAGES OVER BURNING SINCE THE EXISTING VEGETATION IS MAINTAINED AND THE AREA WILL RECOVER FASTER THAN IF IT WERE BRUSH HOGGED, DISKED, AND RE-SEEDED. CLEARING THE AREA WOULD POTENTIALLY PROVIDE AN OPPORTUNITY FOR NOXIOUS WEEDS TO BECOME ESTABLISHED IN THE IMPACTED AREA. GRADING AND RECONTOURING WILL NOT BE NECESSARY, AND COMPACTION IS NOT AN ISSUE. SAMPLES WILL BE COLLECTED SIX MONTHS AFTER TREATMENT TO ASSESS PROGRESS.

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). _____

Date of commencement of Site Investigation. 01/30/2012 _____

Date of completion of Site Investigation. 04/26/2012 _____

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

We talked with Kris Neidel and emailed a Form 27 on 11/9/2019 stating that we would address in April/May of 2020 because of snow on the ground. The Covid closures impacted the timeframe and our plan is to take soil samples of the sites SS11 and SS17 for testing that are the culprits keeping REM 6938 open from the previous Operators submissions from 2012 and 2013. Talked with Kris Neidel again on May 29, 2020 found out that the original update was not logged in the system because we needed to use the eForm system. We plan to take soil samples the week of June 15th, 2020 and report the results back to close this matter.

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

Signed: John Stevens

Title: Manager

Submit Date: 06/02/2020

Email: john.stevens@thunder-river.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: 06/02/2020

Remediation Project Number: 6938

COA Type**Description**

	Within 30 days of receiving lab sample results, the Operator shall provide a supplemental Form 27 that includes a documentation showing; where samples were collected, depth of samples collected, field notes, and laboratory results.
	Samples should be collected in the following 3 areas; SS17, SS11 and "stock pile".
	Operator should provide notice to Environmental staff, Kris Neidel (kris.neidel@state.co.us) or 970-846-5097 72 hrs prior to any sampling events.

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**

402411100	FORM 27-SUPPLEMENTAL-SUBMITTED
402411120	REMEDIAL ACTION PLAN
402411121	REMEDIAL ACTION PLAN

Total Attach: 3 Files

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

Environmental	Review of document 2231634, identified 3 areas where soils area greater than 910-1; Near SS17, SS11 and "stock pile". (note: it is stated that the stock pile is located "close to the Fuqua 18-15 well pad").	06/02/2020
---------------	--	------------

Total: 1 comment(s)