

State of Colorado Oil and Gas Conservation Commission

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401998858

Receive Date:

07/16/2020

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>MARKUS PRODUCTION, INC</u>	Operator No: <u>53790</u>	Phone Numbers
Address: <u>39 FAIRWAY LANE</u>		
City: <u>LITTLETON</u>	State: <u>CO</u> Zip: <u>80123</u>	
Contact Person: <u>Mark Brown</u>	Email: <u>mark@markusproduction.com</u>	
		Phone: <u>(720) 350-8858</u>
		Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11542Initial Form 27 Document #: 401616673

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 checked="" 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>111693</u>	API #: _____	County Name: <u>JACKSON</u>
Facility Name: <u>STATE 1-36</u>		Latitude: <u>40.539473</u>	Longitude: <u>-106.441769</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NWNW</u>	Sec: <u>36</u>	Twp: <u>7N</u>	Range: <u>81W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CHMost Sensitive Adjacent Land Use Dry Range LandIs 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	GROUNDWATER	0	Excavation
Yes	SOILS	4' x 125'	Excavation & Measurement
No	SURFACE WATER	0	none present
No	VEGETATION	0	on pad area

INITIAL ACTION SUMMARY

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

Per Form 19 filed 8/28/17 the oil on the water pit was soaked up utilizing absorbent pellets and then picked up from the pit area with a backhoe and hauled off location via truck on 8/18/17. Photo attached to said Form 19 showed pit after removal of oil. The material from the pit along with contaminated material that was picked up from along side CR 26B was hauled to the Ault, CO Waste Management disposal facility and manifests submitted with subsequent Form 19 to closing the spill and opening this Form 27 Remediation Project.

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):

After removal of the existing tin horn and any contaminated soil surrounding it, a soil sample will be taken from the bottom of the tin horn along with sidewall samples from the excavation area. Samples will also be taken from the bottom of the pit area, along with from each wall of the pit. Additional samples will be taken along the spill path as shown on the attached map. All samples will be tested in accordance with the Table 910-1 concentration levels, and once all samples comply, then clean soil material will be used to backfill the excavated area.

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?

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 well has been shut-in since the incident and plas are to PxA the well. A Form 6 will be filed no later than July 6, 2018 and this action will remove the source of the produced oil and hence any spill possibility. The tin horn will be removed and if any contaminated soil is found, it will be laid out on black plastic and bermed to prevent any run-off, or loaded directly into dump truck to haul to commercial disposal.

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.

In the event any contaminated soil is found, it will be hauled to commercial disposal facility.

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) _____ 10

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.

not applicable

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.

After removal of the existing tin horn and any contaminated soil surrounding it, a soil sample will be taken from the bottom of the base of the pit area along with sidewall samples from the excavation area. All samples will be tested in accordance with the Table 910-1 concentration levels, and once all samples comply, then clean soil material will be used to backfill the excavated area.

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. 08/14/2017

Actual Spill or Release date, if known. 08/11/2017

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/11/2017

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 08/11/2017

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. 08/01/2018

Date of completion of Reclamation. _____

OPERATOR COMMENT

Attached are soil sample analysis taken from 10/18 after the tin horn water pit was removed and then follow up sampling from 08/19 when additional contaminated dirt was removed. Manifests for the material removed are also attached.

Plan is to suck the water out of the pit area and continue to remove additional contaminated soil and then resample where hot samples remain currently to bring into compliance. Once clean samples are obtained clean soil will be used to backfill all excavated areas. This work is to be initiated by 8/15/2020.

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

Signed: ` Mark Brown

Title: President

Submit Date: ` 07/16/2020

Email: mark@markusproduction.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: 07/17/2020

Remediation Project Number: 11542

COA Type**Description**

	Within 14 days of approval of this document; a map showing the sample locations and depths, any information on delineation, estimated volume of soil to be removed, etc should be submitted on a form 27.
	Future sampling events should be characterized, for COGCC table 910-1, the entire spill path that flowed along the county road, spill number 451718.
	Water in pit should be disposed of as E&P waste.

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**

401998858	FORM 27-SUPPLEMENTAL-SUBMITTED
402444976	DISPOSAL MANIFESTS
402445046	ANALYTICAL RESULTS
402445047	ANALYTICAL RESULTS
402445051	ANALYTICAL RESULTS
402445053	ANALYTICAL RESULTS
402445054	ANALYTICAL RESULTS
402445068	ANALYTICAL RESULTS

Total Attach: 8 Files

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

Environmental	The operator shall comply with Rule 910.b.3. The operator shall ensure that analytical laboratories use appropriate methods with detection limits less than or equal to the concentrations in Table 910-1. Some PAH samples (for samples provided on this document) had detection limits above the concentrations of table 910-1.	07/17/2020
Environmental	Project summary can be found in attachment 402445068.	07/17/2020

Total: 2 comment(s)