

State of Colorado Oil and Gas Conservation Commission

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402527625

Receive Date:

11/09/2020

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	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 285.2739
City: DENVER State: CO Zip: 80202		Mobile: (970) 987.4650
Contact Person: Brett Middleton	Email: bmiddleton@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9490 Initial Form 27 Document #: 2211267

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 checked="" 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: LOCATION	Facility ID: 335013	API #: _____	County Name: GARFIELD
Facility Name: Riley 1	Latitude: 39.441860	Longitude: -108.138610	
	** correct Lat/Long if needed: Latitude: 39.450371	Longitude: -108.132837	
QtrQtr: NWNW	Sec: 17	Twp: 7S	Range: 96W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications OL 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? Yes

Other Potential Receptors within 1/4 mile

No water wells within 1/4 mile, Riley Gulch is adjacent to the site.

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) produced water impacted soils _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	30' X 30' X 30' BGS	Soil 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.

Please refer to the previous Form 27, COGCC Document Number 2521303 (Remediation #5224).

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):

This site has been fully investigated, six grab samples were collected from the side walls and 4 grab samples from the bottom of the excavation to ensure compliance with COGCC table 910-1.

Proposed Groundwater Sampling

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

no groundwater is expected to be encountered

Proposed Surface Water Sampling

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

no surface water is expected to be encountered

Additional Investigative Actions

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

this site has been delineated by numerous borings, impacts were fully delineated during the dig and haul remediation project

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 15

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 1200

NA / ND

-- Highest concentration of TPH (mg/kg) 486

-- Highest concentration of SAR 2.2

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 30

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 0'

Number of groundwater monitoring wells installed 4

Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA 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 Source impacted soils were excavated and hauled under manifest to Piceance Creek Disposal Facility owned by Dalbo Holdings Inc. located in Meeker Colorado, facility ID 07RB0987 for 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.

This site has been under active remediation previously Cool-ox was initially used and more recently Biovent/SVE have been in use. Caerus excavated the remaining impacted soils and haul them to landfill for disposal. Approximately 1242 cu. yards were disposed of to RNI's Piceance Creek disposal facility in Meeker Colorado under manifest. The excavation was sampled on the side walls and at the base of the excavation to ensure compliance with COGCC table 910-1. The excavation area was backfilled with clean fill material from the site. Initial site clearance sample S Wall (South Wall) sample was 2120 mg/kg TPH the site was then further excavated and the follow up sample was non-detect for TPH. Caerus is requesting relief from the previously issued COAs and requesting NFA based on the attached historic narrative provided by LTE.

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) 1206

Name of Licensed Disposal Facility or COGCC Facility ID #

Yes Excavate and onsite remediation

No Land Treatment

No Bioremediation (or enhanced bioremediation)

No Chemical oxidation

Yes Other over burden was excavated and determined compliant with COGCC table 910-1

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.

Multiple attempts were made to sample the monitoring wells which were dry. The monitoring wells were plugged with COGCC approval. Groundwater has been dry or BTEX results have been non-detect since September 2010. Monitoring wells were verified dry on June 2013, October 2014, October 2016, and August 2018 through additional soil borings or excavation.

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:

Impacted soils from the historic spill were excavated and disposed of at a commercial landfill. Overburden soils were sampled and deemed compliant for reuse.

Volume of E&P Waste (solid) in cubic yards 1242

E&P waste (solid) description excavated impacted soils from spill

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: RNI Piceance Creek disposal facility

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? Yes _____

Does the previous reply indicate consideration of background concentrations? Yes _____

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? 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.

THE SURFACE AREA IMPACTED BY THIS PROJECT IS LOCATED ON AN EXISTING PAD'S WORKING SURFACE AND WILL NOT NEED TO BE RECLAIMED UNTIL FINAL RECLAMATION.

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. _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 07/09/2018

Date of completion of Remediation. 07/27/2018

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Please see attached Historic Narrative, based on remediation compliance results and groundwater being either non-detect of BTEX for 6 quarters or dry since 2011 and verified in June 2013, October 2014, October 2016 and August 2018 Caerus is requesting NFA for this project.

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

Signed: Brett Middleton

Title: Environmental Lead

Submit Date: 11/09/2020

Email: bmiddleton@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: 11/16/2020

Remediation Project Number: 9490

COA Type**Description**

	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if surface and/or ground water is found to be impacted, then further investigation and/or remediation activities will be required at the site. In addition, the non-working surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules including the establishment of vegetative cover on non-cropland and successful growth on cropland. Landowner must approve reclamation of cropland.
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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**

402527625	FORM 27-SUPPLEMENTAL-SUBMITTED
402527626	REMEDATION PROGRESS REPORT

Total Attach: 2 Files

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

Environmental	Updated Operator's Remediation Completion Report to include Final Closure Request based on attached remediation report (doc #402527626) and final closure request included under Operator Comment.	11/16/2020
Environmental	The attached remediation report (doc #402527626) provides additional information to address the potential for groundwater impacts, as required by the COA attached to doc #401721776. Based on the information provided in the attached report, the COGCC concurs with the Operator's assessments that previously observed groundwater was perched or discontinuous or that the absence of groundwater observed since 2013 may be the result of other external factors and that the pathway for soil hydrocarbons to leach into groundwater is closed as no impacted soil remains.	11/16/2020

Total: 2 comment(s)