

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:

402600970

Receive Date:

02/18/2021

Report taken by:

BOB CHESSON

Site Investigation and Remediation Workplan (Initial 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: GREAT WESTERN OPERATING COMPANY LLC	Operator No: 10110	Phone Numbers
Address: 1001 17TH STREET #2000		Phone: (720) 595-2132
City: DENVER	State: CO	Zip: 80202
Contact Person: Jason Davidson	Email: jdavidson@gwp.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16770

Initial Form 27 Document #: 402600970

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 Facility Closure - Wellhead and Flowline |

SITE INFORMATION

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

Facility Type: WELL	Facility ID: _____	API #: 001-06503	County Name: ADAMS
Facility Name: DAVIS 1-30	Latitude: 39.845298	Longitude: -104.472466	
** correct Lat/Long if needed: Latitude: 39.845228		Longitude: -104.472455	
QtrQtr: NESE	Sec: 30	Twp: 2S	Range: 63W
Meridian: 6	Sensitive Area? Yes		

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Agricultural

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

The Davis 1-30 wellhead and associated 542-foot flowline are surrounded by agricultural fields in all directions. The flowline runs southeast from the wellhead to the tank battery. The tank battery, which is addressed under a separate Form 27 (Document #402601098), is located approximately 565 feet to the southeast of the wellhead. West Sand Creek, an ephemeral drainage, is in place $\frac{1}{4}$ mile to the west. There are no groundwater wells mapped within $\frac{1}{4}$ mile of the wellhead and flowline. Depth to groundwater is expected to be encountered at 70 feet below ground surface. There are no additional sensitive areas or wildlife habitats identified within a quarter mile of the wellhead and flowline. See the attached Figure 1 for an illustration of the location of 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)

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Unknown	Not yet determined

INITIAL ACTION SUMMARY

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

Great Western proposes to conduct closure of the Davis 1-30 wellhead and flowline. Plugging and abandonment of the well is scheduled to commence on 3/16/2021 and be completed by 3/18/2021. Flowline removal activities and cut and cap activities are planned to commence on 3/24/2021 and be completed by 3/26/2021. Great Western will conduct site investigation activities, field screening, and confirmation soil sampling activities during closure in accordance with COGCC 900 Series Rules. Discreet soil samples will be collected and analyzed pursuant to Rule 915, following the general sample collection guidance in Rule 915.e.(2). All waste generated during the closure activities will be managed and disposed of at Waste Connections' Denver Regional Landfill in Erie, CO in accordance with Rules 905 and 906.

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):

Four discreet soil samples will be collected for field screening at the wellhead. At least one of the field screening samples will be submitted to an accredited laboratory for analysis. Soil samples will be analyzed for benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, and Total Volatile Petroleum Hydrocarbons (TVPH [C6-C10]) by EPA Method 8260 and Total Extractable Petroleum Hydrocarbons (TEPH [C10-C36]) by EPA Method 8015. Analytical results for TVPH and TEPH will be added together to calculate Total Petroleum Hydrocarbons (TPH). See the attached Figure 2 for an illustration of the wellhead layout and proposed discreet soil sample locations for field screening and for laboratory analysis. See the Additional Investigative Actions section below for a summary of the flowline investigation and sampling activities.

Proposed Groundwater Sampling

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

Depth to groundwater in the vicinity of the facility has been determined to be approximately 70 feet below ground surface based on ground elevation and alluvial groundwater elevation contours from the 2010 Lost Creek Basin Aquifer Recharge and Storage Study. Groundwater or a pathway to groundwater are not expected to be encountered during facility closure activities. However, if groundwater is encountered, one groundwater sample will be collected in accordance with COGCC Rule 915.e.(3), and will be submitted to an accredited laboratory for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260.

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):

Great Western will remove the flowline by cutting it in 50' to 100' sections and pulling it from the subsurface. Up to four discreet soil samples will be collected for field screening during flowline abandonment. If indications of soil impacts are present, the samples will be submitted to an accredited laboratory for analysis as discussed in the Proposed Soil Sampling section above. If indications of groundwater impacts are present, samples will be collected and submitted to an accredited laboratory for analysis as discussed in the Proposed Groundwater Sampling section above. See the attached Figure 3 for an illustration of the wellhead, flowline, and associated tank battery and proposed field screening sample locations.

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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Operator will either dig and haul impacted soils to a commercial landfill or treat impacted soils above COGCC Table 915-1 concentration levels onsite.

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.

A remediation or closure plan will be developed based on the results of the confirmation soil sampling results.

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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other closure report. _____

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: _____

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.

If necessary, the site will be reclaimed in accordance with COGCC 1000-Series Rules.

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. 02/05/2021

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/16/2021

Date of commencement of Site Investigation. 03/24/2021

Date of completion of Site Investigation. _____

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

The landowner was notified on February 5, 2021.

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

Signed: Jason Davidson

Title: Senior EHS Specialist

Submit Date: 02/18/2021

Email: jdavidson@gwp.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: BOB CHESSON

Date: 02/18/2021

Remediation Project Number: 16770

COA Type**Description**

--	--

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**

402600970	FORM 27-INITIAL-SUBMITTED
402601088	MAP
402601093	SOIL SAMPLE LOCATION MAP
402601095	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

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

Environmental	Operator shall submit a Form 27 Supplemental Report within 90 days of performing this environmental investigation.	02/18/2021
Environmental	Upon discovery of flowline release during removal, the operator must investigate the extent of release and provide a supplemental form 27 with proposed investigation sample sites for COGCC staff approval.	02/18/2021

Total: 2 comment(s)