

# State of Colorado Oil and Gas Conservation Commission

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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	<b>Phone Numbers</b>
Address: 1001 17TH STREET #1600		Phone: (970) 285-2925
City: DENVER State: CO Zip: 80202		Mobile: (970) 640-6919
Contact Person: Blair Rollins	Email: brollins@caerusoilandgas.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 8255 Initial Form 27 Document #: 2147922

#### 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 LINED EARTHEN PIT CLOSURE  |

#### SITE INFORMATION

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

Facility Type: PIT	Facility ID: 278619	API #:	County Name: GARFIELD
Facility Name: NP EF C27 595	Latitude: 39.589010	Longitude: -108.043950	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENW	Sec: 27	Twp: 5S	Range: 95W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes 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

ACCORDING TO COGCC GIS ONLINE MAPPING THERE ARE 2 STREAMS, AND 1 WATER WELL WITHIN 1/4 MILE OF PAD.

# 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
	SOILS	IMPACTS WILL BE DETAILED IN FORM 19	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.

The following activities have been, or will be carried out in support of pit closure activities conducted in support of this project: 905.b(2) & 905.b(4) ? Above&#8208;liner fluids and solids will be removed from the pit and will be reused or disposed&#8208;of at an approved disposal facility with appropriate receipts and manifests.

905.b(3) ? Liner will be removed and reused/recycled or disposed of at an approved disposal facility with appropriate receipts and manifests. 905.b(4) ? Representative grab samples will be collected from the pit bottom following removal of the pit liner and will be analyzed for compliance with COGCC Table 910&#8208;1. 905.c ? In the event the constituents of concern found below the liner are in excess of Table 910&#8208;1 allowable concentrations and above background concentrations, a Form 19 (Spill/Release Report) will be submitted to document the failure of the pit liner.

## 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 ):

please see attached

### Proposed Groundwater Sampling

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

Ground water is not expected since it was not discovered during the initial rounds of drilling.

### 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 ):

please see attached

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 11

Number of soil samples exceeding 910-1 8

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

Approximate areal extent (square feet) 10000

### NA / ND

-- Highest concentration of TPH (mg/kg) 1320

-- Highest concentration of SAR 37.8

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 32

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 80'

Number of groundwater monitoring wells installed 0

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

0 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?

Caerus will confirm compliance with COGCC Table 915-1 through soil sample and analysis prior to closure of the remediation project.

# REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes \_\_\_\_\_

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Based on the continued success of this remediation demonstrated through reduced TPH concentrations in the soil boring results included in Table 2 of the attached ROWC, SVE air flow increasing over the life of the remediation project, and continued PID readings from the SVE trailer exhaust, Caerus plans to continue to utilize the bio-vent wells for remediation with quarterly enhanced SVE events using the powered SVE trailer.

## 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.

Based on the continued success of this remediation demonstrated through reduced TPH concentrations in the soil boring results included in Table 2 of the attached ROWC, SVE air flow increasing over the life of the remediation project, and continued PID readings from the SVE trailer exhaust, Caerus plans to continue to utilize the bio-vent wells for remediation with quarterly enhanced SVE events using the powered SVE trailer.

## Soil Remediation Summary

☒ In Situ

Yes Bioremediation ( or enhanced bioremediation ) \_\_\_\_\_

No Chemical oxidation \_\_\_\_\_

Yes Air sparge / Soil vapor extraction \_\_\_\_\_

Yes Natural Attenuation \_\_\_\_\_

No 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 \_\_\_\_\_

No Land Treatment \_\_\_\_\_

No Bioremediation (or enhanced bioremediation) \_\_\_\_\_

No Chemical oxidation \_\_\_\_\_

No 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.

In the event that impacts to groundwater are identified, a vertical and lateral extent would be determined and an appropriate insitu remediation and monitoring plan would be prepared and submitted to the COGCC.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

**Report Type:** ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☒ O&M Report  
☒ Other 2020 Assessment ROWC and SVE Tracking Log \_\_\_\_\_

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No \_\_\_\_\_

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.

The pit will be backfilled to grade. Pad reclamation will be carried out when appropriate, based on well productivity and plans for future development.

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). \_\_\_\_\_ 04/07/2014

Date of commencement of Site Investigation. \_\_\_\_\_ 09/19/2014

Date of completion of Site Investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. \_\_\_\_\_ 09/19/2014

Date of completion of Remediation. \_\_\_\_\_

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

Based on the continued success of this remediation demonstrated through reduced TPH concentrations in the soil boring results included in Table 2 of the attached ROWC, SVE air flow increasing over the life of the remediation project, and continued PID readings from the SVE trailer exhaust, Caerus plans to continue to utilize the bio-vent wells for remediation with quarterly enhanced SVE events using the powered SVE trailer.

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

Signed: Blair Rollins

Title: EHS Specialist

Submit Date: 01/27/2021

Email: brollins@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: 02/25/2021

Remediation Project Number: 8255

**COA Type****Description**

	Operator shall submit a Supplemental eForm 27 to present a comprehensive assessment of horizontal and vertical delineation of soil impacts for contaminants of concern listed on Table 915-1. The Operator's comprehensive report shall also address the potential for groundwater impacts and shall include as an attachments a soil analytical summary table, groundwater sample analytical summary table, and site diagram depicting soil and groundwater sample locations. Operator's analytical summary tables shall include comparisons of sample analytical results to Table 915-1 using the Protection of Groundwater Screening Level Concentrations.
	COGCC GIS Online topographic map depicts the location of the pit at the confluence of Ben Good Creek and East Fork Parachute Creek. Analytical Summary Table provided as an attachment to Initial Spill/Release Report (doc #400772451) documents TPH exceedances to depths of 32' at South SBN01 boring location.  Operator shall collect soil samples for the complete Table 915-1 list using the Protection of Groundwater Soil Screening Level Concentrations. The Operator may request a modified list of contaminants concern through a Supplemental eForm 27, per Rule 915.e.(2).C.

**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**

402583401	FORM 27-SUPPLEMENTAL-SUBMITTED
402583475	MONITORING REPORT
402584046	MONITORING REPORT

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)