

# State of Colorado Oil and Gas Conservation Commission

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402660584

Receive Date:

04/15/2021

Report taken by:

Jim Hughes

## 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>BERRY PETROLEUM COMPANY LLC</u>	Operator No: <u>10091</u>	<b>Phone Numbers</b>
Address: <u>11117 RIVER RUN BLVD</u>		Phone: <u>(661) 616-3941</u>
City: <u>BAKERSFIELD</u>	State: <u>CA</u>	Zip: <u>93311</u>
Contact Person: <u>Jon Armstrong</u>	Email: <u>jarmstrong@bry.com</u>	Mobile: <u>(661) 203-4205</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 15535Initial Form 27 Document #: 402377242

#### 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 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>SPILL OR RELEASE</u>	Facility ID: <u>474500</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>Long Ridge J15</u>		Latitude: <u>39.609861</u>	Longitude: <u>-108.038222</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NW/SE</u>	Sec: <u>15</u>	Twp: <u>5S</u>	Range: <u>95W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications MLMost Sensitive Adjacent Land Use grazingIs 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
Yes	SOILS	177 cu yds	Calculation of excavated soil

## INITIAL ACTION SUMMARY

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

Excavated to dry soil and no smell or visible signs of condensate. Excavated floor to bedrock.

## 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 ):

A sample was taken from the land farm to assess the progress of the remediation to date. The results will be submitted with next month's Form 27.

### Proposed Groundwater Sampling

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

Should groundwater be encountered within the proposed drilling depth a sample will be taken for analysis to determine compliance with Table 910-1 standards.

### 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 ):

Berry has successfully delineated both the vertical and horizontal extents of the underground spill. Berry completed six additional wells, 3 of which had water and 3 of which were dry serving as the lateral extent delineations for the spill. Please refer to the attached COA responses for further information.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 7

Number of soil samples exceeding 910-1 4

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

Approximate areal extent (square feet) 600

### NA / ND

-- Highest concentration of TPH (mg/kg) 9372.1

-- Highest concentration of SAR 37.8

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 8

### 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) 7.63

-- Highest concentration of Toluene (µg/l) 119

-- Highest concentration of Ethylbenzene (µg/l) 14.5

-- Highest concentration of Xylene (µg/l) 188

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.

Material was excavated and moved to adjoining location. Material was stockpiled on pit liner and will be spread out on location for landfarming operations. Following COGCC guidance Berry's submitted plan an additional 6 exploratory boreholes were completed by 11/18/20. Of the 6 boreholes 3 contained fluid and 3 were dry, the three additional boreholes containing fluid will be outfit with pumps next week to continue fluid removal. To date the fluid removed from the original borehole is as follows, 1,050 BBLs of produced water and 50 BBLs of condensate.

## 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.

Material will be spread on location and landfarmed until 910 standards are met. Plans to spread material and start landfarming will proceed as soon as approval is granted. An estimated 3 month time frame for soil to pass standards is expected. As an initial remediation step Berry intends to pump the well dry and monitor for any additional inflow this initial strategy serves to purposes, firstly the removal of produced fluids from the subsurface and, secondly, as a potential delineation of the vertical extent of the contamination. It is believed the fluid in the well originated around the 27' bgs mark and made its way down into the bottom of the wellbore prior to the placement of isolating materials around the liner. The removal of the fluid will be performed via a 1" pump which will deposit the fluids into a portable tank. The captured fluids will be taken to Berry's O29 E&P Waste Facility, processed through the gun barrel and placed into the impoundment. Samples of the fluid will be taken for chemical analysis.

To address the residual TPH in the floor of the excavation, 1,100 pounds of sodium percarbonate were distributed around the excavation floor and allowed to sit for a day. The day following the application of the chemical oxidant approximately 60 BBLs of water source from the Colorado river was used to flush the oxidant down into the fractures below the excavated area to oxidize any residual petroleum constituents in the subsurface fractures.

## Soil Remediation Summary

☒ In Situ

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

Yes \_\_\_\_\_ Chemical oxidation

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

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

\_\_\_\_\_ Other \_\_\_\_\_

☒ Ex Situ

No \_\_\_\_\_ Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

Yes \_\_\_\_\_ Excavate and onsite remediation

Yes \_\_\_\_\_ Land Treatment

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

Yes \_\_\_\_\_ Chemical oxidation

Yes \_\_\_\_\_ Other \_\_\_\_\_ Landfarm

## Groundwater Remediation Summary

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

Yes \_\_\_\_\_ 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.

At this time Berry does not believe groundwater has been impacted by this spill. However the spill does appear to be contained within a perched area of Long Ridge where recharge waters could be impacted by any residual TPH located in the fractures below the pipeline leak. Berry has applied chemical oxidant to the excavation and washed the material into the subsurface fractures to remediate any residual hydrocarbons. Berry will monitor potential groundwater impacts via downgradient surface water monitoring and observation well monitoring and monitoring beginning in Spring 2021.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other monthly

**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.

Berry plans to landfarm the contaminated soil at the adjacent J15 wellpad. Once the landfarmed material meets the 910-1 standards Berry will return this material to the excavated locatoin to serve as fill. The returned material will then be covered with topsoil and graded to match the surrounding contours of the pipeline right-of-way. The graded top soil will then be covered with an approved seed mixture and reclaimed to its previous condition.

Is the described reclamation complete? No \_\_\_\_\_

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? Yes \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### **PRIOR DATES**

Date of Surface Owner notification/consultation, if required. 03/30/2020

Actual Spill or Release date, if known. 03/30/2020

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 03/30/2020

Date of commencement of Site Investigation. 03/30/2020

Date of completion of Site Investigation. 04/01/2020

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 04/01/2020

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

### **SITE RECLAMATION DATES**

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

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

**OPERATOR COMMENT**

This is an ongoing remediation project covering both soil and water from an underground pipeline leak near the J15 wellpad in April of 2020. Berry identified the underground leak in April after a strong odor and wet soil were noticed by a Berry operator in the pipeline right-of-way near the J15 pad. The site was excavated and the contaminated soils were taken to the adjacent J15 pad for landfarm treatment. The soils were landfarmed throughout the 2020 season and the most recent analytical results show the soil passes the 915-1 standards. Berry intends to perform any additional testing which might be required to close out this location and place the soil back into the excavated area as soon as possible. Berry has delineated the soil contamination both laterally and down to bedrock, so the completion of the landfarming should end the soils portion of this remediation project. The spill did seep down into the fractures in the bedrock which Berry has addressed by installing a combination of extraction and observation wells. The wells successfully delineated the lateral extent of the spill in the bedrock, however Berry has been asked to drill an additional well until it hits groundwater or reaches 250' to properly delineate the vertical extent. Berry intends to perform this work within the next two months to complete this delineation. The underground spill is being addressed by continuously pumping the produced fluids (both produced water and condensate) from the wells and transporting the removed fluids to the P32 E&P Waste Facility's impoundment. To date Berry has removed approximately 55 BBLs of fluid to date (53 PW and 2 condensate) and will continue to pump these wells until they are dry. There has been significant progress as evidenced by the dropping static fluid columns in the extraction wells. Berry does not currently have a timeline for the completion of this work. In addition to the extraction work, Berry applied approximately 1100 pounds of sodium percarbonate to the bottom of the excavated area and washed this into the bedrock fractures with fresh water to oxidize any condensate trapped in the subsurface.

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

Signed: Jon Armstrong

Title: R&E Engineer II

Submit Date: 04/15/2021

Email: jarmstrong@bry.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: Jim Hughes

Date: 05/19/2021

Remediation Project Number: 15535

**Condition of Approval****COA Type****Description**

	The operator will submit analytical results of the May 8-9 sampling event on a supplemental Form 27 once the report becomes available.
1 COA	

**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**

402660584	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

**General Comments**

User Group	Comment	Comment Date
Environmental	A COA on Initial Form 27 Document #402377242 states, "The land farm treatment cell, as described in this Initial Form 27, shall exclusively contain impacted material from Spill/Release Point ID #474500. No other material may be added to this treatment cell without prior approval." Recent inspections by COGCC EPS staff appear to show that impacted material from Spill/Release Point ID #479912 have been added to this land farm treatment cell without prior approval.	05/19/2021
Environmental	In the Source Removal Summary portion of this document, the operator has stated that "1,050 BBLs of produced water and 50 BBLs of condensate" have been removed from the monitoring wells. Operator comments on this document state, "53 PW and 2 condensate". The operator will provide a total of fluids removed from the monitoring wells on the next supplemental form 27.	05/19/2021

Total: 2 comment(s)