FORM
27
Rev 3/16

State of Colorado
Oil and Gas Conservation Commission

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Document Number: 402684507
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Report taken by: KRIS NEIDEL

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 INFORMATON

Name of Operator: ROBERT L BAYLESS PRODUCER LLC Operator No: 6720
Address: 621 17TH ST STE 2300
City: DENVER State: CO Zip: 80293
Contact Person: Helen Trujillo

Phone Numbers
Phone: (505) 564-7801
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18652 Initial Form 27 Document #: 402684507

PURPOSE INFORMATION

- ☐ 901.e. Sensitive Area Determination
- ☒ 909.c.(1), Rule 905: Pit or PW vessel closure
- ☐ 909.c.(2), Rule 906: Spill/Release Remediation
- ☐ 909.c.(3), Rule 907.e.: Land treatment of oily waste
- ☐ 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure
- ☐ 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
- ☐ Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
- ☐ Rule 909.e.(2)B.: Closure of remediation project
- ☐ Rule 906.c.: Director request
- ☐ Other

SITE INFORMATION

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

Facility Type: PIT Facility ID: 117165 API #: County Name: RIO BLANCO
Facility Name: PHILADELPHIA CREEK 18 Latitude: 39.873969 Longitude: -108.725289
** correct Lat/Long if needed: Latitude: 39.873441 Longitude: -108.724890
QtrQtr: NWSW Sec: 15 Twp: 2S Range: 101W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications OH
Most Sensitive Adjacent Land Use Rangeland
Is domestic water well within 1/4 mile? No
Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

A dry ephemeral drainage lies approximately 110 feet to the south with Douglas Creek located approxmiatly 1,895 feet to the east.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [x] **E&P Waste**
  - [x] Produced Water
  - [ ] Oil
  - [ ] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	TBD	TBD

INITIAL ACTION SUMMARY

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

In the center of the pit, a hand auger will be used to delineate vertically and laterally in 1-foot increments to a maximum depth of 5-feet (maximum depth hand auger can extend). Soils will be field screened with a PID and underlying soil conditions noted. A sample will be collected from bottom of the pit from the interval that field screened the highest and analyzed for full Table 915-1. Sample will also be collected from the four side walls. Bayless is requesting a reduce analyte list for the side walls if the pit bottom sample confirms no exceedances in the analytes Bayless is requested to be removed. The reduced analyte list for the side wall is being requested for TPH/BTEX/Inorganics.
If impacts are observed extending beyond 5-feet vertically or horizontally, a sample will be collected at the 5-foot depth and results will be submitted on a Supplemental Form 27, along with Bayless' proposed actions to utilize excavation equipment or a geo-probe rig to delineate the full extent of impacts.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

- [x] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Five samples will be collected (1-pit bottom and 4-side walls). Bayless is proposing to analyze the pit bottom for full Table 915-1 and if analytes do not exceed COGCC thresholds, its being requested that the side walls samples be analyzed for a reduced analyte list consisting of TPH/BTEX/Inorganics.

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

- [x] Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Borehole delineation via hand auger to evaluate the underlying soil

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 5

Number of soil samples exceeeding 910-1: 0

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

Approximate areal extent (square feet): 0

NA / ND

--: Highest concentration of TPH (mg/kg): 0

--: Highest concentration of SAR: 0

BTEX > 910-1:

Vertical Extent > 910-1 (in feet): 0

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

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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If impacted soil is encountered, soil will be excavated via backhoe and either landfarmed onsite or hauled offsite 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.

TBD

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 _____

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.

Upon approval and closure of the pit, reclamation will be conducted in accordance with the 900 and 1000 series rules. The pit will be backfilled to the current grade of the pad with native soil from the surrounding pad.

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? Yes

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. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/01/2021

Date of commencement of Site Investigation. _____

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

Please forward onto Kris Neidel

This Initial Form 27 is being submitted to outline the subsoil investigation and sampling procedures associated with for the PHILADELPHIA CREEK 18 (PC18) and to obtain a REM#.

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

Signed:` Helen Trujillo Title: Prod & Reg

Submit Date:` 05/11/2021 Email: notices@rlbayless.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: 06/21/2021

Remediation Project Number: 18652

Condition of Approval

COA Type	Description
	Samples location selection should be guided by rule 915.e.(2)B.
	This Site Investigation and Remediation Workplan (Form 27) is conditionally approved; however, additional information or activities may be required during the course of remediation.
	By Rule 913.b(2)C., samples for 915-1 compliance shall be discrete NOT composite.
	Request for amending subsequent sample analytes is approved with the following conditions; the full 915-1 sample was collected in the area most likely to have been impacted, guidance on 915.e.(2).C were met, detection limits were below concentrations on table 915-1.
	From COGCC operator guidance, Rule Citation: Rule 915.e.(2).C., “Discrete grab samples of the most impacted material must be used to demonstrate the contaminants of concern present in the impacted material.”
	One sample, from the low point in existing pit bottom shall be for COGCC Table 915-1.
6 COAs	

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
402684507	FORM 27-INITIAL-SUBMITTED

Total Attach: 1 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)