

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402722451

Receive Date:

06/28/2021

Report taken by:

Jason Kosola

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: WESTERN OPERATING COMPANY | Operator No: 95620 | Phone Numbers Phone: (303) 893-2438 Mobile: () |
| Address: 1165 DELAWARE STREET #200 | | |
| City: DENVER | State: CO Zip: 80204 | |
| Contact Person: Steve James | Email: steve@westernoperating.com | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18958 Initial Form 27 Document #: 402722451

PURPOSE INFORMATION

- ☐ Rule 913.c.(1): Pit or Cuttings Trench closure.
- ☐ Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- ☒ Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- ☐ Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- ☐ Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- ☐ Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- ☐ Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- ☐ Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- ☐ Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- ☐ Rule 913.g: Changes of Operator.
- ☐ Rule 915.b: Request to leave elevated inorganics in situ.
- ☐ Other: _____

SITE INFORMATION

No Multiple Facilities

| | | | |
|--|--------------------|---------------------|--|
| Facility Type: WELL | Facility ID: _____ | API #: 061-06174 | County Name: KIOWA |
| Facility Name: BUTLER USA 1-X | | Latitude: 38.421440 | Longitude: -102.444060 |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SWNE | Sec: 10 | Twp: 19S | Range: 45W Meridian: 6 Sensitive Area? Yes |

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Range

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

Depth to water is estimated. The nearest permitted DWR water well (permit receipt #9088102) located 1.8 miles south reported a depth to water of 56 feet in 1974 at the time of well construction. Chivington Reservoir is located approximately 0.75 miles southeast.

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 | 30 x 75 feet | Visual observation |

INITIAL ACTION SUMMARY

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

A leak was discovered by the pumper while at the Bertha Pyles facility. Oil was observed running down the cattle trail. The initial Form 19 (Document Number 2224175) indicates that the release origin was located approximately 550 feet north of the Bertha Pyles facility. Upon discovery, the Butler 1X well was shut in and a vacuum truck was used to recover the released fluids. The area was then treated with Reclaim-O.

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):

Three hand auger soil borings will be advanced within the area impacted by the release. Each boring will be advanced to 5-feet below ground surface (bgs). A photoionization detector will be used to screen soil from ground surface to total depth of each boring. Visual observations of soil type and potential hydrocarbon impact such as staining and odor will be recorded. One soil sample will be collected from each soil boring from the vertical interval with the greatest field evidence of hydrocarbon impact. If no field impact is observed the soil sample will be collected from 1-foot bgs. Three additional surficial soil samples will be collected along drainages leading away from the release. A proposed soil sample location map is attached.

All samples will be submitted to an accredited laboratory using COGCC approved methods for analysis of BTEX, TPH-GRO/DRO/ORO, EC, SAR, and pH.

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

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

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated?
Approximate areal extent (square feet) 5800

NA / ND

 Highest concentration of TPH (mg/kg)
 Highest concentration of SAR
 BTEX > 915-1
 Vertical Extent > 915-1 (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 915-1

 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 915-1
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.

Released fluids were collected by a hydrovacuum rig.

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.

Reclaim-O was applied to the affected area.

Soil Remediation Summary

☐ In Situ ☐ Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

_____ 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

Approved Reporting Schedule:

☒

Quarterly

☐

Semi-Annually

☐

Annually

☐

Other

☐

Request Alternative Reporting Schedule:

☐

Semi-Annually

☐

Annually

☐

Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

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:

None.

Volume of E&P Waste (solid) in cubic yards 0

E&P waste (solid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC 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:

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.

TBD

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 provide the seed mix?

If YES, does the seed mix comply with local soil conservation district recommendations?

Did the local soil conservation district provide the seed mix?

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation.

Proposed date of completion of Reclamation.

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 03/05/2012

Actual Spill or Release date, or date of discovery. 03/05/2012

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/05/2012

Proposed site investigation commencement.

Proposed completion of site investigation.

REMEDIAL ACTION DATES

Proposed start date of Remediation.

Proposed date of completion of Remediation.

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

☐ Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

If completion of remediation can be demonstrated by January 15, 2022, Western Operating requests that Table 910-1 standards be used to determine compliance in accordance with COGCC Rule 915 f.

The proposed sampling is scheduled to occur in July 2021. A supplemental Form 27 presenting the results will be submitted to the COGCC by the end of August 2021.

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

Signed: Steve James

Title: President

Submit Date: 06/28/2021

Email: steve@westernoperating.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: Jason Kosola

Date: 07/12/2021

Remediation Project Number: 18958

Condition of Approval

COA Type

Description

| | |
|--|---|
| | <p>913.d IMPLEMENTATION SCHEDULE</p> <p>In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.</p> <p>Per Rule 913.d.(2) Operator shall submit a Supplemental Form 27 with an updated Implementation Schedule at least 14 days in advance of any schedule changes.</p> <p>Operator will submit a specific implementation schedule in accordance with Rule 913.d.</p> |
|--|---|

| | |
|--------|---|
| | 913.e.(3) Reporting Schedule In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule. |
| | Operator must submit Form 19 Subsequent requesting closure of spill 2224175 within 10 days of approval of this Form 27 Initial. |
| | Operator has requested to use the old standard of COGCC Table 910-1 citing Rule 915f. Operator may utilize COGCC Table 910-1 for all soil analysis. Remediation must be complete by January 15, 2022 otherwise COGCC Table 915-1 must be utilized for remedation standards. |
| 4 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.

| <u>Att Doc Num</u> | <u>Name</u> |
|--------------------|---------------------------|
| 402722451 | FORM 27-INITIAL-SUBMITTED |
| 402722604 | SITE INVESTIGATION PLAN |

Total Attach: 2 Files

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|-------------------|----------------|---------------------|
| | | Stamp Upon Approval |

Total: 0 comment(s)