

State of Colorado
Oil and Gas Conservation Commission

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09/07/2021
Report taken by:
ROB YOUNG

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>PADCO LLC</u>	Operator No: <u>24500</u>	Phone Numbers Phone: <u>(918) 6309912</u> Mobile: <u>(918) 6309912</u>
Address: <u>800 W 6TH STREET SUITE 1010</u>		
City: <u>LOS ANGELES</u>	State: <u>CA</u>	Zip: <u>90017</u>
Contact Person: <u>Dan Richmond</u>	Email: <u>dan@dsrinc.net</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15981 Initial Form 27 Document #: 402498609

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: Remediation (ID# 15981) closure, Resolve COA (ID# 402529236) and historic spill (ID#469838) closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>104590</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>GULLEY 1-D</u>	Latitude: <u>39.865019</u>	Longitude: <u>-103.311837</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>21</u>	Twp: <u>2S</u>	Range: <u>53W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Agriculture
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

None

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

DESCRIPTION OF IMPACT

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Row 1: Yes, SOILS, Pit boundary, Visual

INITIAL ACTION SUMMARY

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

Historic produced water pit, initial Form 27 submitted on 09/828/2020, performed initial sampling on 10/02/2020, sample analysis results dated 10/12/2020 indicated soil impacted by hydrocarbons

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):

Excavate sample points 1 and 2 (see attachment A-C) to a depth of ~8-10 feet with a backhoe. Observe soil during excavation, obtain grab samples for layers of concern (if any, record depth) if not grab sample at deepest point (record depth). Repeat grab sample procedure for points 3,4,5, & 6. Analysis for TPH, pH. Grab sample from at ~2-3 feet at points 1 and 2 for pH, SAR, EC.

Proposed Groundwater Sampling

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

Empty text box for groundwater sampling details.

Proposed Surface Water Sampling

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

Empty text box for surface water sampling details.

Additional Investigative Actions

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

Empty text box for additional investigative actions.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 11
 Number of soil samples exceeding 915-1 0
 Was the areal and vertical extent of soil contamination delineated? Yes
 Approximate areal extent (square feet) 6500

ND Highest concentration of TPH (mg/kg) _____
 -- Highest concentration of SAR 4.1
 BTEX > 915-1 No
 Vertical Extent > 915-1 (in feet) 20

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
 _____ 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

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.

Excavate and loadout into haul trucks an estimated 350 cubic yards of potential hydrocarbon contaminated soil associated with historic skim pit (20'x20') and produced water pit (60'x55'). Topsoil (~0-4') will be removed and stored adjacent to area, grab sample of topsoil will be tested to confirm "clean" per Table 9-10. Impacted soil from from two (2) areas will be removed, onsite PID readings or lab analysis will be used to determine limits of what is removed. Final soil excavation will be to remove soil until "clean" characteristics are achieved based on COGCC Table 9-10 thresholds.

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.

After potential contaminated soils are removed, closure grab samples will analyzed to validate "clean" per Table 9-10. Verified "clean" fill soil will be hauled in and/or used from historic berms around production equipment (which is being removed). "Topsoil" will be returned and dressed to match agriculture field soil height. Existing field topsoil will be sampled for a background and the replaced topsoil will be amended (if necessary) to match with existing agricultural soil parameters. Land will be returned to the farmer for future crop planting.

Soil Remediation Summary

- In Situ
- Ex Situ
- _____ Bioremediation (or enhanced bioremediation) Yes _____ Excavate and offsite disposal
- _____ Chemical oxidation If Yes: Estimated Volume (Cubic Yards) _____ 350

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly

Semi-Annually

Annually

Other

Skim Pit and Produced Water Pit Backfill Approval

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 Removed Hydrocarbon Impacted Soil, Backfill Approval Request

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:

Hydrocarbon impacted soil hauled to republic Services Tower Landfill for their beneficial use

Volume of E&P Waste (solid) in cubic yards _____ 500

E&P waste (solid) description Hydrocarbon Impacted Soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Republic Services Tower Landfill

Volume of E&P Waste (liquid) in barrels _____ 0

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? Yes _____

If YES:

Compliant with Rule 913.h.(1).

Compliant with Rule 913.h.(2).

Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? Yes _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? Yes _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

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.

Remove/set aside topsoil, removal of potential contaminated soil, relace with "clean" (per Table 9-10) fill soil, replace topsoil, turn back to farmer for agricultural use (no seeding anticipated)

Is the described reclamation complete? Yes _____

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. 01/11/2021

Proposed date of completion of Reclamation. 03/05/2021

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/02/2020

Proposed site investigation commencement. 09/01/2020

Proposed completion of site investigation. 10/30/2020

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/11/2021

Proposed date of completion of Remediation. 02/26/2021

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

Documentation indicating the three (3) conditions of approval contained in COGCC document number 402593298 (remediation project 15981) have been met.

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

Signed: Ty J Smith

Title: Consultant

Submit Date: 09/07/2021

Email: tysmith@lesair.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: ROB YOUNG

Date: 09/15/2021

Remediation Project Number: 15981

Condition of Approval

COA Type

Description

1 COA	Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.
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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>
402794356	FORM 27-SUPPLEMENTAL-SUBMITTED
402803211	DISPOSAL MANIFESTS
402803213	PHOTO DOCUMENTATION
402803214	CORRESPONDENCE
402803216	ANALYTICAL RESULTS
402803217	ANALYTICAL RESULTS

Total Attach: 6 Files

General Comments

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

Total: 0 comment(s)