

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

KRIS NEIDEL

## 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>ROBERT L BAYLESS PRODUCER LLC</u>	Operator No: <u>6720</u>	<b>Phone Numbers</b>
Address: <u>621 17TH ST STE 2300</u>		Phone: <u>(303) 2969900</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80293</u>
Contact Person: <u>Helen Trujillo</u>	Email: <u>notices@rlbayless.com</u>	Mobile: <u>(505) 330-2593</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

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

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

#### 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 approximately 1,895 feet to the east.

**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	None	Sampling and Analysis

**INITIAL ACTION SUMMARY**

Description of initial action or emergency response measures taken 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 reduced 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**

☒ 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**

☐ 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 exceeding 915-1 5  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 50

### NA / ND

-- Highest concentration of TPH (mg/kg) 9.09  
-- Highest concentration of SAR 70.3  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 5

### Groundwater

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 100'  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 915-1 0

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?

Three (3) background samples were collected from undisturbed points adjacent to the location

☐ 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? Yes

## 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.

## REMEDICATION 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.

Samples collected from within the pit footprint did not indicate any hydrocarbon concentrations exceeding COGCC Table 915-1. The only exceedances were within the inorganics (SAR/EC/pH) and arsenic, which are greater than 3-feet in depth below the pad surface.

## Soil Remediation Summary

☐ In Situ

☐ Ex Situ

           Bioremediation ( or enhanced bioremediation )

           Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

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.

## **REMEDATION 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 Closure Request (NOC) \_\_\_\_\_

### **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: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION 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? Yes \_\_\_\_\_

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.

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 provide the seed mix? Yes \_\_\_\_\_

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

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. \_\_\_\_\_

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

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

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

This Supplemental Form 27 is being submitted for the PC #18 pit to request final closure approval of the pit, allowing RL Bayless to continue with reclamation of the site.

Samples collected from within the pit footprint did not indicate any hydrocarbon concentrations exceeding COGCC Table 915-1. Soils were field screened in 1-foot increments, which results ranged from 10-22 ppm. Samples were collected from the interval that field screened the hottest and submitted to the lab for analysis. As previously approved within the initial Form 27, the bottom was analyzed for full Table 915-1 and the side walls were analyzed for TPH/BTEX/Inorganics as there were no Table 915-1 exceedances within the PAH/Metals within the pit bottom sample. The only exceedances were within the inorganics (SAR/EC/pH) and arsenic, which are greater than 3-feet in depth below the pad surface. Bayless is requesting an allowance for the arsenic and inorganic exceedances as the arsenic background is similar to concentrations within the pit, as well as inorganics are at a depth (greater than 3-feet) which poses no threat to vegetation regrowth. Additionally, the area where inorganic exceedances are present, will be capped with native soil from the surrounding area during final reclamation, providing additional protective barrier.

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 Analyst \_\_\_\_\_

Submit Date: ` 07/30/2021 \_\_\_\_\_

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: 12/10/2021 \_\_\_\_\_

Remediation Project Number: 18652 \_\_\_\_\_

## Condition of Approval

### COA Type

### Description

	The surface of this location is Federal, the operator shall comply with BLM Reclamation Rules.
	It appears that inorganics exceed COGCC standards. The operator has consulted with the BLM and provided that information on F27 doc #402881874. All other Contaminates of concern are below COGCC limits.
2 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

402766368	FORM 27-SUPPLEMENTAL-SUBMITTED
402766520	ANALYTICAL RESULTS
402766522	ANALYTICAL RESULTS
402766523	ANALYTICAL RESULTS
402766541	SOIL SAMPLE LOCATION MAP

Total Attach: 5 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Based on review of information presented it appears that no further action is necessary at this time, and 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 at the site.	12/10/2021

Total: 1 comment(s)