

# State of Colorado Oil and Gas Conservation Commission

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402959957

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03/14/2022

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.

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

### OPERATOR INFORMATION

Name of Operator: EVERGREEN NATURAL RESOURCES LLC	Operator No: 10705	Phone Numbers Phone: (303) 2848820 Mobile: ( )
Address: 1875 LAWRENCE ST STE 1150		
City: DENVER	State: CO Zip: 80202	
Contact Person: Mackenzie Smith	Email: mackenzie.smith@enrllc.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 22520 Initial Form 27 Document #: 402959957

#### 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: SPILL OR RELEASE	Facility ID: 481375	API #: _____	County Name: LAS ANIMAS
Facility Name: Banito Ferderal 31-24		Latitude: 37.249510	Longitude: -104.731730
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 24	Twp: 32S	Range: 66W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Gulnare-Allens Park complex, 5 to 35 percent slopes, non-crop

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**

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## 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	surface	soil samples

### INITIAL ACTION SUMMARY

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

On January 7, 2022 at 1400 a spill was discovered at the Banito Federal 31-24 location by an employee. Spill originated at the wellhead, due to a broken 2" valve. Spill was immediately isolated by the employee. ENR employees were contacted immediately to assess damage/spill volume. The spill ran west 69 feet, changed direction, flowed 38 feet south, changed direction and flowed 100 feet southeast off location. The spill did not impact waters of the state or high priority habitat. Initial estimations of spill volume are 46 bbls of produced water. 5 bbls of produced water were recovered via water truck. After investigation, it was determined that the spill was caused by a 2" valve on the wellhead waterline which had broken due to freezing conditions. The valve was immediately changed.

### 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 ):

3 in-situ samples were collected from the spill pathway and 1 additional native sample was collected for comparison.

Site 1 - 37.24930, -104.73188

Site 2 - 37.24934, -104.73193

Site 3 - 37.24928, -104.73175

Site 4 (Native) - 37.24938, -104.73203

All samples collected were grab samples, and analyzed for Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble).

#### 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 4  
Number of soil samples exceeding 915-1 3  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square 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 915-1   

**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.

**NA / ND**

NA Highest concentration of TPH (mg/kg)     
-- Highest concentration of SAR 19  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 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)   

**OTHER INVESTIGATION INFORMATION**

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

One background sample was collected for comparison.

☐ 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?

Continued sampling for SAR is required until Table 915-1 standards are met. No additional native samples intend to be collected.

**REMEDIAL ACTION PLAN****SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

Continued sampling of in-situ spill pathway for SAR is expected. Once additional results are analyzed, it will be determined if removal is required.

**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.

Continued sampling of in-situ spill pathway for SAR is expected. Once additional results are analyzed, it will be determined if removal is required.

**Soil Remediation Summary**

☒ In Situ

☐ Ex Situ

   Bioremediation ( or enhanced bioremediation )  
   Chemical oxidation  
   Air sparge / Soil vapor extraction

   Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards)     
Name of Licensed Disposal Facility or COGCC Facility ID #

Yes Natural Attenuation

Other

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

Reporting approved for 1st and 3rd quarter.

#### ☒ Request Alternative Reporting Schedule:

☒ Semi-Annually

☐ Annually

☐ Other

Request sampling interval change to sample 1st and 3rd quarters.

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? ☐

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.

Continued sampling of in-situ spill pathway for SAR is expected. Once additional results are analyzed, it will be determined if removal is required.

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? No

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

Did the local soil conservation district provide the seed mix? No

## 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. 01/08/2022

Actual Spill or Release date, or date of discovery. 01/08/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/08/2022

Proposed site investigation commencement. 01/08/2022

Proposed completion of site investigation. 04/08/2022

### 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**

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

Signed: Mackenzie Smith

Title: Production Engineer

Submit Date: 03/14/2022

Email: mackenzie.smith@enrllc.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: 03/22/2022

Remediation Project Number: 22520

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

0 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**

402959957	FORM 27-INITIAL-SUBMITTED
402959988	SOIL SAMPLE LOCATION MAP
402959989	ANALYTICAL RESULTS
402959991	ANALYTICAL RESULTS

Total Attach: 4 Files

**General Comments****User Group****Comment****Comment Date**

Environmental	Changed facility type from "well" to "spill". This form is being submitted to remediate impacts from Spill 481375.	03/22/2022
Environmental	Reporting schedule change to 1st and 3rd quarter is approved.	03/22/2022

Total: 2 comment(s)