

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

Jason Kosola

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

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

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

| |
|--|
| |
|--|

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

SoilNumber of soil samples collected 7Number of soil samples exceeding 915-1 3Was the areal and vertical extent of soil contamination delineated? NoApproximate areal extent (square feet) 0**Groundwater**Number of groundwater samples collected 0Was extent of groundwater contaminated delineated? NoDepth 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 / NDNA Highest concentration of TPH (mg/kg) -- Highest concentration of SAR 19BTEX > 915-1 NoVertical 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?**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.

Produced water (source) was removed from the spill pathway area through natural attenuation. No remediation required.

REMEDIAL ACTION 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.

No remediation required.

Soil Remediation Summary☒ In Situ☐ Ex Situ Bioremediation (or enhanced bioremediation) Excavate and offsite disposal Chemical oxidationIf Yes: Estimated Volume (Cubic Yards)

_____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

_____ Other _____

_____ 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

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: _____

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.

Soil samples indicate that no reclamation 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

This is the formal request for closure of this Form 27 Remediation for the spill at the Banito Federal 31-24 on January 7th, 2022. All soil samples indicate that levels meet Table 915-1 standards.

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: 04/11/2022

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: 04/21/2022

Remediation Project Number: 22520

Condition of Approval

COA Type

Description

| | |
|-------|---|
| 1 COA | <p>NO FURTHER ACTION:</p> <p>Based on the information presented, it appears that no further remedial 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 groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p> |
|-------|---|

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

| | |
|-----------|--------------------------------|
| 403010993 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403011001 | ANALYTICAL RESULTS |
| 403011002 | ANALYTICAL RESULTS |
| 403011004 | SOIL SAMPLE LOCATION MAP |

Total Attach: 4 Files

General Comments

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

Total: 0 comment(s)