

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403001811

Receive Date:

04/14/2022

Report taken by:

KRIS NEIDEL

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: <u>SWN PRODUCTION COMPANY LLC</u> | Operator No: <u>10396</u> | Phone Numbers Phone: <u>(970) 433-8987</u> Mobile: <u>()</u> |
| Address: <u>P.O. BOX 12359</u> | | |
| City: <u>SPRING</u> | State: <u>TX</u> Zip: <u>77391-2359</u> | |
| Contact Person: <u>Russ Snowden</u> | Email: <u>russ_snowden@swn.com</u> | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22904 Initial Form 27 Document #: 403001811

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>WELL</u> | Facility ID: _____ | API #: <u>081-07348</u> | County Name: <u>MOFFAT</u> |
| Facility Name: <u>AMELIA 44-1</u> | | Latitude: <u>40.581710</u> | Longitude: <u>-107.774710</u> |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: <u>SESE</u> | Sec: <u>1</u> | Twp: <u>7N</u> | Range: <u>93W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Livestock and wildlife grazing

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

N/A

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 | TBD | Soil Analysis if needed |
| UNDETERMINED | SURFACE WATER | TBD | Visual Inspection |
| UNDETERMINED | VEGETATION | TBD | Visual Inspection |

INITIAL ACTION SUMMARY

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

A visual and odor inspection will be performed looking for signs of stained soil, wax, smells or other indications of exceedances, ect that may have affected surface water, vegetation or soils.

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):

One sample will be taken per line, after removal or abandonment, In the area most likely to have been impacted. A visual inspection will be performed on all other part of the lines. We will sample at the well head, cut and cap location. See attached map marked with blue dots.

Proposed Groundwater Sampling

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

Not necessary at this time. If groundwater is encountered at anytime during the proposed activities, COGCC will be notified immediately.

Proposed Surface Water Sampling

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

Not necessary at this time. If there is any indication that surface waters have been affected, surface water samples will be obtained.

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 _____
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) _____

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
_____ 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?

Line abandonment has not yet taken place, samples and investigation will take place after line abandonments have been completed.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The lines in question will be removed from service, flushed with fresh water or inert gases and either abandoned in place to prevent further surface damage or completely removed(surface line).

REMEDATION 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.

Not necessary at this time. If soil analysis does not meet Table 915 requirements it will be submitted with a remediation plan.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____

_____ Air sparge / Soil vapor extraction
_____ 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.

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 _____

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.

Reshape area to the original relative soil positions and contour. Reseed disturbed area."

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? _____

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

Did the local soil conservation district provide the seed mix? Yes

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). 04/25/2022

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

We have done a thorough review of old spills and remediations and nothing was found of the entire field. Please see attached maps.

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

Signed: Karen Maneotis

Title: Regulatory Specialist

Submit Date: 04/14/2022

Email: karen_maneotis@swm.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: 04/22/2022

Remediation Project Number: 22904

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

| | |
|--|--|
| | Surface disturbances shall be reclaimed in accordance with the 1000 Series Reclamation Regulations. Consult COGCC Reclamation Specialist regarding interim and/or final reclamation. |
| | One sample shall be taken of native soil below the cut and cap and analyzed for Table 915-1. |
| | During abandonment procedure, the Operator shall observe soil for any sign of impact such as; odor, black or grey staining, salt impacts, wax, etc. Any area of suspected impact shall be; reported and delineated with soil analytical for Table 915-1. |
| | Operator shall ensure data necessary to satisfy, "Abandonment in place requirements", rule 1105.e., are provided to COGCC via Form 44. |
| | Proposed sample locations are approved (in addition to 4 pipe risers added here in COA's), however if impacts are suspected at other locations, confirmation samples shall be taken at those locations. |
| | Per Rule 911.b. If a spill is discovered during closure activities, a Form 19 spill report shall be filled. (Per 912.b.(1)E, including >10cuyd of contaminated soil.) |
| | All displaced fluid shall be handled as E&P waste. |
| | Inspection document 69800061 states there are 4 pipe risers on pad. Each flowline shall have it's own discrete sample for Table 915-1. |

8 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**

| | |
|-----------|---------------------------|
| 403001811 | FORM 27-INITIAL-SUBMITTED |
| 403015964 | PHOTO DOCUMENTATION |
| 403016374 | SITE MAP |

Total Attach: 3 Files

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

| | | |
|---------------|---|------------|
| Environmental | History of well file shows a pattern of SI well status. | 04/22/2022 |
| Environmental | 5/11/2011 inspections states, "NO PRODUCTION EQUIPMENT ON LOCATION." | 04/22/2022 |
| Environmental | It is stated that the well pad is greater than 1/4 mile from surface water. The well pad is less than 300 feet from an lay creek. | 04/22/2022 |

Total: 3 comment(s)