

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403253498

Receive Date:

12/07/2022

Report taken by:

ALEX FISCHER

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: RED MESA HOLDINGS/O&G LLC | Operator No: 10254 | Phone Numbers Phone: (970) 903-4072 Mobile: () |
| Address: 5619 DTC PARKWAY - STE 800 | | |
| City: GREENWOOD VILLAGE State: CO Zip: 80111 | | |
| Contact Person: Jim Hughes | Email: jimo.hughes@state.co.us | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27455 Initial Form 27 Document #: 403253498

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: WELL | Facility ID: _____ | API #: 067-05346 | County Name: LA PLATA |
| Facility Name: DUDLEY (OWP) 2 | Latitude: 37.090240 | Longitude: -108.127850 | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: SWNW | Sec: 23 | Twp: 33N | Range: 12W Meridian: N Sensitive Area? Yes |

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Third Canyon is approximately 1,100 feet to the south 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 | TBD | Field screening and analytical results. |

INITIAL ACTION SUMMARY

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

The COGCC Orphan Well Program will be plugging the Dudley (OWP) #2 well and decommissioning any associated on location flow lines and/or production equipment. Soil samples will be collected in accordance with COGCC Rule 915.e(2)B. Samples will be collected from the wellhead excavation, flow line path(s), as well as any other areas likely to have been impacted. Samples will be submitted for laboratory analysis of Table 915-1 constituents.

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):

Soil samples will be collected for laboratory analysis of Table 915-1 constituents from areas most likely to have been impacted. Visual inspection and field screening of soils will be conducted in the areas surrounding the flow line(s) if present, and the well head. Based on these observations, soil samples may be collected and submitted for laboratory analysis of Table 915-1 constituents. Discrete soil samples will be collected for confirmation of compliance with Table 915-1.

Proposed Groundwater Sampling

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

If a pathway to groundwater is discovered or groundwater is encountered during remediation activities, a sample(s) will be collected and analyzed for Table 915-1 constituents and notice given to COGCC EPS staff.

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 _____ 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?

Background soil conditions will be determined by the analysis of a sample(s) collected from nearby, non-impacted native soil to establish background concentrations.

☐ 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**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

The Dudley (OWP) #2 well will be plugged and abandoned. Any/all production equipment associated with this well on the Oil and Gas Location will be removed or decommissioned.

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.

Impacted material discovered during the scope of this work plan will be removed and disposed of as E&P waste at an approved facility.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 10

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____ 0

_____ 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

☒ 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 Plug and abandon well and decommission on site
production equipment and flow line(s).

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

The scope of work described in this Initial Site Investigation and Remediation Workplan will be completed by the COGCC Orphaned Well Program. The COGCC is not an oil and gas operator. This document will be used, in part, to bid out various phases of this facility closure.

Operator anticipates the remaining cost for this project to be: \$

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.

Reclamation will be in accordance with COGCC 1000 Series Rules, and will be addressed during a separate phase of the OWP work.

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? _____

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). _____

Proposed site investigation commencement. 03/15/2023

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 Site Investigation and Remediation Work Plan is being submitted by the COGCC Orphaned Well Program.

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

Signed: Jim Hughes

Title: OWP Western Region EPS

Submit Date: 12/07/2022

Email: jimo.hughes@state.co.us

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: ALEX FISCHER

Date: 02/15/2023

Remediation Project Number: 27455

COA Type**Description**

| | |
|---------|---|
| | Operator shall collect sample(s) from comparable, nearby non-impacted native soil for purposes of establishing background soil conditions including pH, electrical conductivity (EC) and sodium adsorption ratio (SAR), per Rule 915.e.(2).D. |
| | Final Reclamation shall comply with the COGCC 1000 Series Rules. Consult COGCC Reclamation Specialist regarding interim and/or final reclamation. |
| | Reseeding with species consistent with the adjacent plant community is encouraged. The Operator will use a seed mixture requested by the surface owner. In the absence of an agreement between the operator and the affected surface owner as to what seed mix should be used, the operator shall consult with a representative of the local soil conservation district to determine the proper seed mix to use in revegetating the disturbed area. A Bureau of Land Management approved seed mix specific to the ecological site would also be acceptable. |
| | All risers associated with the well/facility, including both flowline and gathering line risers must be removed per 1004 Rules. |
| | No current Form 6 in database. Per Rule 434, operator shall submit a Form 6, Well Abandonment Report – Notice of Intent to Abandon for review by COGCC OGLA and Engineering Units. |
| | Form 42 not found in well file for online flowline abandonment. Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements. |
| | Form 44 not found in well file for offline flowline abandonment. Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements. |
| | It is stated, Visual inspection and field screening of soils will be conducted in the areas surrounding the flow line(s) if present, and the well head. Based on these observations, soil samples may be collected and submitted for laboratory analysis of Table 915-1 constituents. Discrete soil samples will be collected for confirmation of compliance with Table 915-1. At a minimum, discrete samples shall be collected from each of these facilities. |
| | Off Location Flowline Facility ID: 476824 shall be closed via Form 27. |
| | Remote Tank Battery Facility ID: 429845 was closed under REM 7170 but has not been reclaimed. |
| | Pit Facility ID 115565 shall be closed via Form 27. |
| 11 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.

| <u>Att Doc Num</u> | <u>Name</u> |
|--------------------|---------------------------|
| 403253498 | FORM 27-INITIAL-SUBMITTED |
| 403253562 | SOIL SAMPLE LOCATION MAP |

Total Attach: 2 Files

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|-------------------|---|---------------------|
| Environmental | Inspection Doc #685303669 stated, ": In use - 2" steel line from wellhead tubing. (B) point is unknown. Not in use - Steel riser on R side of wellhead. (B) point is unknown." Inspection Doc # 00535919 indicate Pit(s) still open. | 02/15/2023 |
| Environmental | FEE/FED National Wetlands Inventory show a Freshwater Riverine Wetland App 3466 feet east of well head. High Priority Habitat Elk Severe Winter Range High Priority Habitat Mule Deer Severe Winter Range High Priority Habitat Mule Deer Winter Concentration Static water app 24' bgs based on Water Well Permit 100293; Receipt 9123883 | 02/15/2023 |

Total: 2 comment(s)