

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403272607
Receive Date:
03/10/2023
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: POC-I LLC	Operator No: 10386	Phone Numbers Phone: (307) 746-6468 Mobile: ()
Address: P.O. BOX 51208		
City: CASPER State: WY Zip: 82605		
Contact Person: Becky Podio	Email: rpodio@gmail.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28244 Initial Form 27 Document #: 403272607

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

Yes Multiple Facilities

Facility Type: PIT	Facility ID: 116587	API #: _____	County Name: MOFFAT
Facility Name: ILES GATHERIN FACILITIES	Latitude: 40.307715	Longitude: -107.689715	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT	Facility ID: 116589	API #: _____	County Name: MOFFAT
Facility Name: ILES DOME SUNDANCE TANK BAT 2/PIT	Latitude: 40.307379	Longitude: -107.689185	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT Facility ID: 119213 API #: County Name: MOFFAT
Facility Name: ILES DOME UNIT Latitude: 40.307410 Longitude: -107.689390
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: CNW Sec: 23 Twp: 4N Range: 92W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

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? Yes

Other Potential Receptors within 1/4 mile

The site sits within 1/4 mile of the following the Colorado Parks and Wildlife High Priority Habitat. Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area, Elk Winter Concentration Area, Elk Severe Winter Range, Elk Migration Corridor, Aquatic Cutthroat Trout designated Crucial Habitat, Greater Sage Grouse General Habitat Management Area, Columbian Sharp-tailed Grouse Winter Range, Columbian Sharp-tailed Grouse Production Area, Greater Sage Grouse Priority Habitat Management Area, and Aquatic Native Species Conservation Waters.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Unknown	Will be determined via visual, field screening, and laboratory confirmation sampling

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 pit will be emptied and all residual waste will be removed and all E&P Waste will be removed and/or excavated and taken to Elk Springs Brine Disposal in Elk Springs, CO, Twin Enviro Services in Milner, CO, or Greenleaf Environmental Services in De Beque, CO. Visual and field screening will initially be conducted followed by confirmation soil sampling.

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):

Facility ID 116589 consists of 1 large pit and 2 smaller associated pits. COGCC pit Facility IDs 116587 and 119312 have been added to Site Information to be closed but it is unlikely and unclear if they are the 2 smaller associated pits. A concrete vessel is also located at the tank battery but will not be a part of the investigation associated with this Form 27. After initial screening and excavation, discrete confirmation soil samples will be collected along the sidewalls and the base of the pits. Samples will be analyzed for Table 915-1 parameters plus Mercury. A proposed map of soil samples from the pits is attached.

Proposed Groundwater Sampling

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

Groundwater is not expected to be encountered in the vicinity of the pits. In the event that groundwater is encountered, grab samples will be collected and analyzed for Table 915-1 parameters. In the event that groundwater is above Table 915-1 allowable levels, additional groundwater assessment will be proposed in a supplemental Form 27. Groundwater monitoring wells are currently located at the facility and are associated with Remediation #8398. A groundwater update with proposed sampling and investigation was provided via COGCC Document #403271467.

Proposed Surface Water Sampling

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

Surface water sampling was proposed in a Form 27 via COGCC Document #403295887.

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 0

-- Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 _____

-- Highest concentration of SAR _____

Was the areal and vertical extent of soil contamination delineated? No _____

BTEX > 915-1 No _____

Approximate areal extent (square feet) 0 _____

Vertical Extent > 915-1 (in feet) _____

Groundwater

Number of groundwater samples collected 0 _____

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No _____

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacts identified above Table 915-1 will be removed or remediated in accordance with COGCC 900 series rules. Samples will additionally be analyzed for Mercury.

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.

After delineation of impacts, a remediation strategy will be implemented to ensure compliance with COGCC 900 series rules.

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

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

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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 _____

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.

POC has sufficient insurance and bonding to fully address the anticipated costs of Remediation, including the remaining estimated costs for this project. The cost for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. POC makes no representation or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 45000 _____

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.

The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules with an approved Colorado Parks and Wildlife seed mix, pending future facility decommissioning activities.

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. 09/25/2023

Proposed date of completion of Reclamation. 06/30/2024

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. 01/30/2023

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. _____

Proposed completion of site investigation. 07/15/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/02/2022

Proposed date of completion of Remediation. 01/02/2025

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

Please route to Kris Neidel and Alex Fischer.

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

Signed: Becky PodioTitle: Petroleum EngineerSubmit Date: 03/10/2023Email: rpodio@gmail.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: ALEX FISCHERDate: 03/20/2023Remediation Project Number: 28244**COA Type****Description**

	If groundwater is encountered during pit decommissioning activities, samples will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB, using standard methods appropriate for detecting the target analytes in COGCC Table 915-1. Groundwater shall also be sampled and analyzed for In-organics.
	Operator should provide notice to Environmental staff, Kris Neidel (kris.neidel@state.co.us) or 970-846-5097 72hrs prior to mobilization at beginning of all sampling events or Field work on this project.
	This Site Investigation and Remediation Workplan (Form 27) is conditionally approved; however, additional information or activities may be required during the course of remediation.
	Haul Tickets shall be provided on a Supplemental Form 27.
	The following should be addressed on a Supplemental Form 27 prior to starting work; How will samples be collected?, Will liners be removed/replaced?, How will waste be; moved, solidified, stored, hauled. Will netting be removed? will Netting be reinstalled?
5 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**

403272607	FORM 27-INITIAL-SUBMITTED
403343140	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

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

Environmental	FEE/FED Timing Restrictions Immediately adjacent to Controlled Surface Use National Wetland Inventory Fresh Water Emergent (Spring Gulch) 500 feet west	03/20/2023
Environmental	Activity described here shall fully delineate both the lateral and vertical extent of the pit areas for all contaminants in Table 915-1 with the addition of Mercury.	03/16/2023

Environmental	<p>The above referenced F27 has been returned to Draft for the following reasons:</p> <p>The topo map references Isle Dome Spill point. What Spill/Release ID is this referring to? \$ amount for remediation needs to be filled out.</p> <p>Remediation Progress Update is requesting Semi-Annually. At a minimum, the Remediation Progress Update will be Quarterly if not Monthly.</p> <p>There are four (4) Pits (including the concrete pit) and three (3) Pit Facility IDs. Pit Facility IDs: 116587, 116589, and 119213. All seem to relate to the large pit. Under the Projec, Purpose, & Site Information tab, Site Information, Multiple Facilities should be YES, and all three (3) pits should be listed.</p> <p>In addition to sampling for Table 915-1 Clean-up Concentration, Mercury shall be sampled and analyzed for.</p> <p>Under the Site Investigation Plan tab, it stated, "The pit will be emptied and all residual waste will be removed and all E&P Waste will be excavated and taken to a licensed commercial disposal." The F27 Site Investigation/Remediation Plan shall state what the licensed commercial facilities are.</p> <p>Groundwater monitoring wells have been installed at the facility and adjacent to the large pit. Groundwater monitoring shall be addressed in the F27. Surface water sampling shall be addressed downgradient of the effluent discharge from the pit facility.</p>	01/13/2023
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Total: 3 comment(s)