

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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Report taken by:
Steven Arauza

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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 285-2925
City: DENVER State: CO Zip: 80202		Mobile: (970) 640-6919
Contact Person: Blair Rollins	Email: brollins@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 23864 Initial Form 27 Document #: 403074715

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: 481663	API #: _____	County Name: GARFIELD
Facility Name: A03 Vault valve release	Latitude: 39.643139	Longitude: -108.148575	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 3	Twp: 5S	Range: 96W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GM Most Sensitive Adjacent Land Use rangeland
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

None

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- X E&P Waste
X Produced Water
Oil
Condensate
Drilling Fluids
Drill Cuttings
Other E&P Waste
Workover Fluids
Tank Bottoms
Pigging Waste
Rig Wash
Spent Filters
Pit Bottoms
Other (as described by EPA)
X Non-E&P Waste
fresh water from river mixed with produced water

DESCRIPTION OF IMPACT

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Row 1: Yes, SOILS, 15 feet bgs, Soil sampling and laboratory analysis

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 February 18, 2022, the plug on a blind flange was found to be missing, releasing produced water into the valve can. The release was stopped, and the missing plug was replaced. Standing fluids were recovered using a vacuum truck. The release was reported in Colorado Oil and Gas Conservation Commission (COGCC) Form 19 Document 402960724 to open Spill/Release Point ID 481663. COGCC Form 27 Document 403074715 was later submitted to open Remediation Project Number 23864. See the attached Report of Work Completed (ROWC) for site investigation details.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

X Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Due to access issues associated with winter conditions, additional assessment will be postponed until Spring 2023. Prior to conducting additional assessment, a plan will be submitted in a Supplemental Form 27. Based on results of site investigation to date, Caerus proposes a reduced soil analyte list of SAR and pH.

Proposed Groundwater Sampling

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

Empty text box for groundwater sampling details.

Proposed Surface Water Sampling

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

Empty text box for surface water sampling details.

Additional Investigative Actions

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

Empty text box for additional investigative actions.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3
Number of soil samples exceeding 915-1 3
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 200

NA / ND

-- Highest concentration of TPH (mg/kg) 219.7
-- Highest concentration of SAR 18
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 15

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 _____

NA Highest concentration of Benzene (µg/l) _____
NA Highest concentration of Toluene (µg/l) _____
NA Highest concentration of Ethylbenzene (µg/l) _____
ND Highest concentration of Xylene (µg/l) _____
NA Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
0 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

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Caerus is in the process of determining the vertical and horizontal extent of any contamination associated with the project. Once the extent of impacts have been determined, Caerus will prepare a plan for source removal or closure under a Rule 915.b. reclamation plan.

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.

On March 9, 2022, initial site investigation activities were performed. One soil sample was collected from the floor of the vault at approximately 4 inches below the vault floor, or 12 feet below ground surface (bgs) to characterize potential soil impacts beneath the point of release (POR). Laboratory results of initial POR characterization exceeded COGCC Table 915-1 Residential Soil Screening Levels for sodium adsorption ratio (SAR), pH, and arsenic. On May 10, 2022, additional release investigation was performed. A vacuum truck was utilized to remove impacted soil from the base of the vault. The vacuum encountered solid rock at approximately 15 inches below the vault floor, or 13 feet bgs. A soil sample was collected from the newly exposed base and submitted for laboratory analysis. Analytical results of the soil sample exceeded COGCC Table 915-1 Residential Soil Screening Levels for SAR, pH, and arsenic.

Additional delineation efforts were performed November 17, 2022. A jackhammer was utilized to remove additional soil from the base of the vault to a total depth of 3 feet below the vault floor, or 15 feet bgs. One soil sample was collected from the newly excavated base to characterize the vertical extent of soil impacts. Laboratory results of the delineation soil sample indicate compliance with COGCC Table 915-1 Residential Soil Screening Levels except for SAR and pH. SAR and pH exceedances remain undelineated in the release area. See the attached ROWC for details.

Soil Remediation Summary

In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

Ex Situ

_____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ 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

No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
No _____ Natural Attenuation
No _____ 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 Q4 2022 REM update

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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, Caerus has general liability insurance in the amount of \$1M, and Caerus has umbrella insurance, which sits over the general liability insurance in the amount of \$75M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$76M.

Operator anticipates the remaining cost for this project to be: \$ 15000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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? No

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?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

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.

Currently, there is no surface disturbance associated with this remediation project. The pipeline vault will be reclaimed when removed from service.

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/09/2022

Proposed site investigation commencement. 03/09/2022

Proposed completion of site investigation. 09/01/2023

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

Caerus requests to utilize the COGCC Table 915-1 Residential Soil Screening Level Concentrations for the A03 Vault Remediation Project based on the following information: The elevation of the Remediation Project is 8,340 feet. The nearest surface water is West Fork Parachute Creek which is an intermittent stream located 5,800 feet to the south at an elevation of 6,800 feet. Two drainage basins are located east and west adjacent to the vault, which drain south into West Fork Parachute Creek. Groundwater is anticipated to be at least 250 feet below ground surface based on land features and water features in the area. Based on the site conditions outlined above, Caerus requests to utilize the COGCC Table 915-1 Residential Soil Screening Level Concentrations for the project as there is no reasonable pathway to groundwater at the location of the Remediation Project. Caerus will provide plans for additional delineation on supplemental documentation.

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

Signed: Chris McKisson

Title: Managing Partner

Submit Date: 02/17/2023

Email: chris.mckisson@confluence-cc.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: Steven Arauza

Date: 04/11/2023

Remediation Project Number: 23864

COA Type**Description**

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**

403260849	FORM 27-SUPPLEMENTAL-SUBMITTED
403324139	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

Environmental	Based on the information provided under Operator Comment, the Operator's request to utilize the Table 915-1 Residential Soil Screening Level concentrations is conditionally approved.	04/11/2023
Environmental	Based on the information provided for soil samples (doc #403324139), the Operator's request for a reduced analyte suite of SAR and pH is conditionally approved	04/11/2023

Total: 2 comment(s)