

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
403306990
Receive Date:
04/20/2023
Report taken by:
Jason Kosola

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: SIMCOE LLC	Operator No: 10749	Phone Numbers
Address: 1199 MAIN AVE SUITE 101		Phone: (970) 852-5172
City: DURANGO State: CO Zip: 81301		Mobile: (970) 769-9523
Contact Person: Sabre Beebe	Email: sabre.beebe@ikavenergy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28914 Initial Form 27 Document #: 403306990

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: 483355	API #:	County Name: LA PLATA
Facility Name: Florida River Plant dehy tank relea	Latitude: 37.156532	Longitude: -107.778232	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SESW	Sec: 25	Twp: 34N	Range: 9W Meridian: M Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Agricultural
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? No

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 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
Yes	SOILS	400	Estimation based on visual assessment at the time of spill and 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.

Operations personnel discovered wet area and immediately shut in tank and equipment. Recovery of standing fluids performed by onsite personnel with a pump, pumping fluids into the water pipeline. Measurement and sampling of wet area performed. Samples processed by GAL for 915 standards.

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):

Five soil samples collected in the wet area. One background sample collected to the north of the facility off of the disturbance. All samples were grab samples 0-6 inches in depth. Arsenic was elevated in the NE corner area, all other sample results returned below the 915.1 standards threshold. Future sample will be only in the NE corner following remediation as planned in this form.

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

Soil

NA / ND

Yes Other SA1000 solution will be tilled into the soils. _____

_____ 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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other _____

Request Alternative Reporting Schedule:

Semi-Annually Annually Other Annual monitoring with reduction of analyte to Arsenic only in the NE area is requested. All other areas samples returned below the standards threshold.

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.

SIMCOE's current general liability insurance limit is adequate to cover this project; however, no claim is anticipated for this effort. This active wellsite and production facilities are anticipated to produce for 20+ years. No additional financial assurance is required for this project. SIMCOE's Form 3 application has been submitted according to guidelines and is currently under review by the COGCC. SIMCOE's corporate officer has provided a certification of financial capability.

Operator anticipates the remaining cost for this project to be: \$ 4000 _____

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: _____

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.

There will be no reclamation on this spill / remediation area. The area is within the active operating area and will remain as is without reclamation. Upon approval of spill closure the area will be re-compacted to aid in ground stability adjacent to active equipment.

Is the described reclamation complete? _____

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). 11/23/2022

Proposed site investigation commencement. 11/23/2022

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/01/2023

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 form 27 is for insitu remediation only in the NE corner of the spill area as the remainder of the area analytic results are below the 915 threshold. No additional work is required in the areas besides the NE corner. Reduced analytes are requested for future sampling. Request is to sample for arsenic only during the monitoring.

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

Signed: Sabre Beebe

Title: Env. Coord.

Submit Date: 04/20/2023

Email: sabre.beebe@ikavenergy.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: 04/20/2023

Remediation Project Number: 28914

COA Type**Description**

	COGCC approves alternate reporting schedule. Operator shall submit Form 27 to update project no later than 4th quarter each calendar year.
	Operator shall submit Form 19 Supplemental requesting closure of associated spill upon approval of this Form 27.
2 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**

403306990	FORM 27-INITIAL-SUBMITTED
403307111	ANALYTICAL RESULTS
403307114	ANALYTICAL RESULTS
403307137	SOIL SAMPLE LOCATION MAP
403307139	PHOTO DOCUMENTATION
403349586	SAFETY DATA SHEETS
403378819	ANALYTICAL RESULTS

Total Attach: 7 Files

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

Environmental	Returned to draft. Summary table of analytical results is missing.	04/19/2023
Environmental	Returned to DRAFT. Operator is proposing in situ treatment of arsenic. Soil amendment application rate should be listed and SDS for soil amendment attached. Form 27 should be assigned to spill number if being submitted to remediate a spill.	03/15/2023

Total: 2 comment(s)