

# State of Colorado Oil and Gas Conservation Commission

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

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

#### 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:

☒ 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
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

Number of soil samples collected 6

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 400

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 5.05

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 1

#### 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

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND 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

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 sample collected north of the location.

☐ 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 NE corner of the spill area is the only area to be addressed. The remainder of the spill area samples returned below the 915 threshold. Impacted materials in the NE corner as marked on the map will be tilled up, treated with SA1000 mixture, tilled again.

### 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.

The area in the NE corner of the release is the only area needing remediation for elevated arsenic. The area will be remediated insitu with SA1000 (25 gallons) mixed with water per manufacturer instructions. The area will be tilled up to alleviate compaction. The SA1000 treatment will be applied to all soils. This process will be repeated until the soils 6-10 inches deep have been treated thoroughly. Monitoring will be performed as approved in this form

### Soil Remediation Summary

☒ In Situ

☐ Ex Situ

Bioremediation ( or enhanced bioremediation )

Chemical oxidation

Air sparge / Soil vapor extraction

Natural Attenuation

Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards)

Name of Licensed Disposal Facility or COGCC Facility ID #

Excavate and onsite remediation

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)