

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403329652

Receive Date:

02/28/2023

Report taken by:

Krystal Heibel

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: <u>PADCO LLC</u>	Operator No: <u>24500</u>	Phone Numbers
Address: <u>800 W 6TH STREET SUITE 1010</u>		Phone: <u>(918) 630-9912</u>
City: <u>LOS ANGELES</u>	State: <u>CA</u>	Zip: <u>90017</u>
Contact Person: <u>Dan Richmond</u>	Email: <u>dan@dsrinc.net</u>	Mobile: <u>(918) 630-9912</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25696 Initial Form 27 Document #: 403124740

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: Abandonment of ~1,850 feet of flowline

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>317064</u>	API #: <u></u>	County Name: <u>WASHINGTON</u>
Facility Name: <u>HARPHAM-62N52W 3NESE</u>		Latitude: <u>40.167465</u>	Longitude: <u>-103.176190</u>
		** correct Lat/Long if needed: Latitude: <u>40.165367</u>	Longitude: <u>-103.181926</u>
QtrQtr: <u>NESE</u>	Sec: <u>3</u>	Twp: <u>2N</u>	Range: <u>52W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>
Facility Type: <u>OFF-LOCATION FLOWLINE</u>	Facility ID: <u>475339</u>	API #: <u></u>	County Name: <u>WASHINGTON</u>
Facility Name: <u>Production Line 3NESE</u>		Latitude: <u>40.165372</u>	Longitude: <u>-103.181953</u>
		** correct Lat/Long if needed: Latitude: <u></u>	Longitude: <u></u>
QtrQtr: <u>SESW</u>	Sec: <u>3</u>	Twp: <u>2N</u>	Range: <u>52W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications OL

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

Other Potential Receptors within 1/4 mile

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|---|
| <input type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input checked="" type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | <u>Gravel</u> |
| <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 checked="" type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | <u></u> |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	HtrTrtr Site, Pit #1 & #2	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.

Initial sampling associated with the abandonment of the Harpham production facility, (2) produced water pits, and 1,850' buried flow line

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):

Samples will be obtained to determine if soils will meet table 9-15 standards. Samples will be grab samples. Approximately (23) samples will be taken, samples will be from the site of each tank, the heater treater, and a set of samples from each produced water pit (center, 4 corners, and each side wall). Samples for the buried flowline will be based on visual observations during excavation.

Proposed Groundwater Sampling

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

If ground water is encountered, a ground water sample will be taken and evaluated.

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 45

Number of soil samples exceeding 915-1 38

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

Approximate areal extent (square feet) 8560

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 16

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)

ND Highest concentration of Toluene (µg/l)

Highest concentration of Ethylbenzene (µg/l)

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?

☐ 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?

Additional sampling will be required to delineate depth of TPH concentration in Pit #1. Samples will be taken during excavation of off-site flowline. Back ground samples will be taken to get an Arsenic background concentration.

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.

The production facility equipment has been removed. The 1,850 foot buried flowline will be dug up and removed. Soils are found to not meet TPH threshold in Table 9-15 will be dug and hauled to an approved waste disposal facility. SAR impacted soils at depths greater than 72" bgs is being requested to be left in place.

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.

See attached remediation action plan. Summary, PADCO will scrape off any clean surface gravel and removed or bury in the pit (with written landowner approval). Soils with TPH, BTEX, Naphthalene contamination will be dug out/loaded/hauled to an approved waste soil disposal site. High SAR, EC, Boron soils will be dug out/loaded/hauled to an approved disposal site. SAR soil is requested to be left in place at depths >72" (crop root depth is 60"). Flowline will be excavated, photos, and samples per attached plan. Closure samples will be taken and analyzed.

Soil Remediation Summary

☒ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
Yes _____ Other Leave SAR impacted soils
below 72" below ground surface
(max crop root depth at 60")

☒ Ex Situ

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) 4000
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

_____ 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 Status of remediation and reclamation

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.

PADCO is adequately bonded per Rule 702 and is compliant with the insurance requirements per Rule 705.

Operator anticipates the remaining cost for this project to be: \$ 40000

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: _____

REMEDIATION COMPLETION REPORT

REMEDIATION 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.

After the abandonment of production facility, remove surface gravel, decompaction around the facility area and roadways, grade level with surrounding agricultural land, return to farmer for planting crops.

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. 06/01/2023

Proposed date of completion of Reclamation. 10/01/2023

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. 08/15/2022

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/15/2022

Proposed site investigation commencement. 08/15/2022

Proposed completion of site investigation. 04/01/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/15/2023

Proposed date of completion of Remediation. 06/01/2023

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

Laboratory copies of analysis are available and can be uploaded if the COGCC wishes.

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

Signed: Ty J Smith

Title: Consultant

Submit Date: 02/28/2023

Email: tysmith@lesair.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: Krystal Heibel

Date: 05/17/2023

Remediation Project Number: 25696

COA Type**Description**

	Soil confirmation sample data indicate that pH, SAR, and EC at the site exceeds the Table 915-1 soil suitability levels for reclamation. The Operator proposes to leave material with elevated levels of pH, SAR, and EC in situ. Reclamation Plan is attached. Reclamation Plan cannot be approved until remaining non soil suitability impacts are remediated and the soil suitability impacts are delineated horizontally and vertically.
	Operator shall submit a revised "Soil Sampling Location Map" that includes: a scale, an aerial photograph that shows the location of field screenings, sample(s), and background sample(s), including samples taken from flowline analysis and delineation from known Table 915-1 exceedances.
	Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.
	Operator will provide the Form 44 Document number for Abandonment Verification submitted pursuant to Rule 1105.f.(2) that includes the requirements of Rule 1105.e. for abandonment in place.
	Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2).
	On the Supplemental Form 27 following off-location flowline abandonment, Operator shall provide the associated Form 44 Flowline Abandonment Verification
	Operator will submit a Form 44 Pre-abandonment notice pursuant to Rule 1105.d. A Form 44 will be filed prior to starting flowline abandonment, and will be included in the Related Forms in a supplemental Form 27. Abandonment will occur per the requirements of Rule 1105. During flowline abandonment, any liquids evacuated from the flowline will be contained and disposed per the requirements of Rule 905. Note: Approval of this Form 27 does not imply approval of pre-abandonment required by Rule 1105.d.
	If groundwater is encountered, a sample will be collected and analyzed for Table 915-1: Organic Compounds in Groundwater and Groundwater Inorganic Parameters.

8 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**

403329652	FORM 27-SUPPLEMENTAL-SUBMITTED
403331480	REMEDIATION ACTION PLAN

Total Attach: 2 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)