

State of Colorado Oil and Gas Conservation Commission

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403381247

Receive Date:

04/26/2023

Report taken by:

Kyle Waggoner

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: INVESTMENT EQUIPMENT LLC	Operator No: 10330	Phone Numbers Phone: (405) 642-9437 Mobile: ()
Address: PMB 412 558 CASTLE PINES PKWY		
City: CASTLE PINES	State: CO Zip: 80108	
Contact Person: Jim Chisholm	Email: investmentequipment@gmail.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18894 Initial Form 27 Document #: 402646539

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: 117586	API #:	County Name: WASHINGTON
Facility Name: COLORADO STATE 1 & 2		Latitude: 39.751264	Longitude: -103.272980
		** correct Lat/Long if needed: Latitude:	Longitude:
QtrQtr: SWNW	Sec: 36	Twp: 3S	Range: 53W Meridian: 6 Sensitive Area? Yes
Facility Type: PIT	Facility ID: 117587	API #:	County Name: WASHINGTON
Facility Name: COLORADO "A" 1		Latitude: 39.750951	Longitude: -103.272409
		** correct Lat/Long if needed: Latitude:	Longitude:
QtrQtr: NESW	Sec: 36	Twp: 3S	Range: 53W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION		Facility ID: 470686	API #: _____		County Name: _____	
Facility Name: _____			Latitude: _____		Longitude: _____	
			** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: _____	Sec: _____	Twp: _____	Range: _____	Meridian: _____	Sensitive Area? No	

Facility Type: OFF-LOCATION FLOWLINE		Facility ID: 470717	API #: _____		County Name: WASHINGTON	
Facility Name: Production Line			Latitude: 39.751120		Longitude: -103.273620	
			** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 36	Twp: 3S	Range: 53W	Meridian: 6	Sensitive Area? Yes	

Facility Type: OFF-LOCATION FLOWLINE		Facility ID: 470718	API #: _____		County Name: WASHINGTON	
Facility Name: Production Line			Latitude: 39.751120		Longitude: -103.273620	
			** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 36	Twp: 3S	Range: 53W	Meridian: 6	Sensitive Area? Yes	

SITE CONDITIONS

General soil type - USCS Classifications SW _____ Most Sensitive Adjacent Land Use Cropland _____

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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- ☐ E&P Waste ☐ Other E&P Waste ☒ Non-E&P Waste
- ☐ Produced Water ☐ Workover Fluids ☐ No waste is currently anticipated
- ☐ 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
UNDETERMINED	GROUNDWATER	N/A	Laboratory analysis, if encountered
UNDETERMINED	SOILS	N/A	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.

A site investigation will be conducted pursuant to COGCC Rule 911 at the Colorado State location, off-location flowlines, on-location flowline(s), tank battery, and location. See attachment for soil sampling and field screening locations.

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):

Grab samples will be taken at the equipment sites, 3 in total; each pit will have the sidewalls sampled and the pit bottom; the larger pit will have two pit bottom samples collected; one background sample will be collected for this location. Soil samples will be analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per COGCC Table 915-1, and EC, SAR, pH, and boron. All samples collected will be analyzed by a certified laboratory using approved COGCC laboratory analysis methods. Please see attached proposed sampling map.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site assessment, a grab groundwater sample will be collected and analyzed for all organic compounds per COGCC Table 915-1.

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):

Visual inspection of the flowlines will occur during abandonment activities. Field personnel will field screen all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling is required. The COGCC Wellhead/Flowline Closure Checklist will be utilized and filled out during the abandonment process. A photolog will be submitted on the subsequent Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 33

Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 1

Highest concentration of SAR

Was the areal and vertical extent of soil contamination delineated? Yes

BTEX > 915-1 No

Approximate areal extent (square feet) 100

Vertical Extent > 915-1 (in feet) 22

Groundwater

Number of groundwater samples collected 0

NA 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?

Two Background samples (Background North, and Background South)

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 540

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Investigation to delineate the impact of the site will continue with more sampling for soil suitability; One metals sample from each pit will also be pulled for analysis and comparison to Table 915 -1 standards.

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.

Pit excavation of hydrocarbon impacted soil was removed and disposed of a Pawnee Waste facility. ~540 cu yds of soil was removed and disposed of, waste manifest attached in remedial report summary.

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.

Further Soil Suitability and Metals Sampling Plan
Investigation to delineate the impact of the site will continue with more sampling for soil suitability. The goal will be to find samples within table 915 -1 standards and accumulate the amount of impacted soil that will be proposed to bury inside the pits below root zone of dry land wheat and dry land corn. These two crops are what the adjacent land use is being used for. One metals sample from each pit will also be pulled for analysis and comparison to Table 915 -1 standards.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 540

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

_____ 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.

N/A

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other Site Assessment Report Update

☐ 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 Assessment/Remediation 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.

Operator is bonded per rule 702 and complies with GL Insurance per Rule 705

Operator anticipates the remaining cost for this project to be: \$ 5000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Contaminated Soil was disposed of at Pawnee Waste Facility

Volume of E&P Waste (solid) in cubic yards 540

E&P waste (solid) description contaminated soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Pawnee Waste

Volume of E&P Waste (liquid) in barrels 0

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.

Reclamation will be in accordance with COGCC 1000 Series Rules and landowner's requests.

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. 06/01/2023

Proposed date of completion of Reclamation. 06/01/2025

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). 08/02/2021

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/01/2023

Proposed date of completion of Remediation. 09/01/2023

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:

Additional remedial actions for sodic soils will be from 5/01/23 to 7/01/23 and then initial commencement of reclamation dates will be 7/01/23 to 9/01/23. After sampling and rough in backfill, Contractor will most likely wait until after wheat harvest, which is around July 4th, for final grade due to the fact that Investment Equipment usually has to get into the farmers field a bit to clean up the edges. All work is estimated to be done by September 1st.

OPERATOR COMMENT

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

Signed: Jim Chisholm

Title: President

Submit Date: 04/26/2023

Email: investmentequipment@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: Kyle Waggoner

Date: 06/02/2023

Remediation Project Number: 18894

COA Type**Description**

	Spill ID# 472607, Rem# 16226: The most recent Form 27 submittal was submitted in Jan 11, 2021. Please provide a supplemental Form 27 with the following information: - A Soil Sample Location Map that shows where the original March 18, 2020 samples. - Please note: Based on the Remediation Schedule for Rem# 16226: COGCC's current rules came into effect on January 15, 2021. Operator is required to comply with the current Rule 911 for facility closure and with Table 915-1 for concentration standards. Operator shall conduct additional investigation for pit closure and spill ID# 472607 remediation and provide analytical in compliance with Table 915-1.
	If a spill/release of produced fluids or E&P waste causes an impact to soil, including boron exceedances, the operator should perform sampling and analysis to fully delineate the lateral and vertical extent of those impacts.
	Please note that any impacted soil that exceeds Table 915-1 cannot be buried within the pit. Please clarify the statement located within the Remedial Action Plan, "The goal will be to find samples within table 915 -1 standards and accumulate the amount of impacted soil that will be proposed to bury inside the pits below root zone of dry land wheat and dry land corn."
	Operator shall submit a revised "CO State Sample Location" map that includes at minimum: an aerial image with a scale that depicts the off- location flowlines, and sample locations for metals, soil sample(s) location(s), and background sample(s), if proposed.
	Operator will continue quarterly reporting until the site investigation is complete and the implementation schedule can be updated. COGCC selected Quarterly under Remediation Progress Update.
	Operator shall provide a comprehensive list of all potential receptors within ¼ mile on the subsequent Supplemental Form 27. Location lies within the following mapped High Priority Habitat(s): - Designated Basin - Pronghorn Winter Concentration Please note that Approval of this Form 27 does not supersede any Federal, State or Local regulations. COGCC recommends consultation with Colorado Parks and Wildlife.
6 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**

403381247	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403381258	REMEDIATION PROGRESS REPORT
403421865	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>Rem# 16226 - associated with closing the COLORADO "A" 1 pit and the other pit Rem# 18894 - associated with "Colorado State" location, off-location flowlines, on-location flowline(s), tank battery, and location</p> <p>Spill ID# 472607 proceeded under Remediation# 16226 within Form 19S, Doc# 402577885</p> <p>Per Doc# 403196653, "two remediation projects are open for Pit closure/decommissioning (pits 117586 and 117587). Operator shall request closure for Remediation Project 16226 and state work is proceeding under Remediation Project 18894. As such, Operator shall address Spill 472607 under Remediation Project 18894 and add the spill to the site information section. The site information section on the subsequent Form 27 Supplemental for Remediation Project number 18894 must include the following: -Spill 472607 -Pit 117586 -Pit 117587 -Location 470686 -Off-location flowline 470717 (request administrative closure and reference remediation project associated with flowline removal) -Off-location flowline 470718 (request administrative closure and reference remediation project associated with flowline removal)"</p>	06/01/2023

Total: 1 comment(s)