

# State of Colorado Energy & Carbon Management Commission

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



Document Number:

403533739

Receive Date:

09/19/2023

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>	<b>Phone Numbers</b>
Address: <u>16508 ARMINTA STREET</u>		
City: <u>VAN NUYS</u> State: <u>CA</u> Zip: <u>91406</u>		
Contact Person: <u>Dan Richmond</u>	Email: <u>dan@dsrinc.net</u>	
		Phone: <u>(918) 630-9912</u>
		Mobile: <u>(918) 630-9912</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 28912 Initial Form 27 Document #: 403356248

#### 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: Removal of off-location flowline

#### SITE INFORMATION

No Multiple Facilities

Facility Type: <u>OFF-LOCATION FLOWLINE</u>	Facility ID: <u>475335</u>	API #: <u></u>	County Name: <u>WASHINGTON</u>
Facility Name: <u>Production Line 21SENE</u>	Latitude: <u>39.864778</u>	Longitude: <u>-103.311991</u>	
** correct Lat/Long if needed: Latitude: <u></u>		Longitude: <u></u>	
QtrQtr: <u>SENE</u>	Sec: <u>21</u>	Twp: <u>2S</u>	Range: <u>53W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Agriculture

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

## 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 checked="" 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	(3) 3'x20'	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 removal of ~475 feet of off-location flowline associated with the plugged and abandoned Gulley #1-D well (API 05-121-08922)

### 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. Samples for the off-location buried flowline will be one (1) at the well location and one (1) at the heater treater riser, other sampling as necessary based on visual observations during the 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. Groundwater is not anticipated based on previous reclamation near this site.

#### 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 20

Number of soil samples exceeding 915-1 5

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

Approximate areal extent (square feet) 180

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 2

#### 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?

A background sample WTB-BG was collected approximately 400' Southeast of the Gulley Off-location flowline. The sample was obtained to determine background concentrations of Table 915-1 metals. A historical background sample was also located (Sample Point A), from March of 2023. The resulting analysis of both background samples indicated native concentrations of arsenic, barium, and selenium are all greater than the "Protection of Groundwater" soil screening levels from Table 915-1.

☐ 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? No

#### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The ~475 feet of buried off-location flowline will be dug up and removed. If any soils are found to not meet Table 915 standards it is anticipated that the soils will be dug and hauled to an approved waste disposal facility. The well has been P&A, the well site equipment has been removed, the production equipment has been removed.

#### 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.

If any contaminated soils are determined (based on soil sample analysis results), these soils will be dug out/loaded/hauled to an approved waste soil disposal site. Closure samples will be taken and analyzed.

#### Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 25

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

No \_\_\_\_\_ 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

### 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: \$ 2000

### 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:

None

Volume of E&P Waste (solid) in cubic yards 25

E&P waste (solid) description hydrocarbon impacted soils

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? No

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? Yes

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 removal of the off-location flowline, refill the trench, 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? 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. 04/03/2023

Proposed date of completion of Reclamation. 11/30/2023

## 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. 05/09/2023

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/03/2023

Proposed site investigation commencement. 05/09/2023

Proposed completion of site investigation. 08/31/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/05/2023

Proposed date of completion of Remediation. 10/31/2023

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:

Extremely wet Spring and Summer which impacted the ability to access the site and obtain additional samples

**OPERATOR COMMENT**

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

Signed: Ty Smith

Title: Consultant

Submit Date: 09/19/2023

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: 11/02/2023

Remediation Project Number: 28912

**COA Type****Description**

	Operator shall update the summary tables within the next Form 27 submittal.  As stated in Doc# 403423114, Operator shall provide justification for use of Residential SSL. Correspondence submitted indicates "PADCO has replaced the use of Table 915-1 "Residential" SSL with "Protection of Groundwater" SSL thresholds in this Supplemental Form 27 and Soil Sample Analysis Summary Table (Attachment C)" but the analytical results table still compare analytes to Residential SSLs.
	Closure request removed. As requested in Doc #403423114, Operator did not characterize site soil for Table 915-1 Metals in Soils. Operator shall characterize site for Table 915-1 Metals in Soils from each soil sampling location prior to requesting No Further Action.  Per Form 27 Initial, Doc #403356248, Operator shall collect confirmation soil samples as described in the Rule 915.e.(2). Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)). In accordance with Rule 915.e.(2).C., Operator has not received approval for an amended soil sampling plan.
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**

403533739	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403533754	CORRESPONDENCE
403533755	AERIAL IMAGE
403533756	SOIL SAMPLE LOCATION MAP
403533757	ANALYTICAL RESULTS
403533760	PHOTO DOCUMENTATION
403533763	DISPOSAL MANIFESTS
403533767	ANALYTICAL RESULTS
403533774	ANALYTICAL RESULTS
403533784	ANALYTICAL RESULTS
403582243	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 11 Files

**General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Barium concentration exceeds the background sample concentrations.	11/02/2023
Environmental	Changed Type of Waste to include E&P Waste: produced water and oil; changed Non-E&P Waste to No.	10/25/2023

Total: 2 comment(s)