

State of Colorado Energy & Carbon Management Commission

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Document Number:

403579066

Receive Date:

11/07/2023

Report taken by:

Krystal Heibel

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>BENCHMARK ENERGY LLC</u>	Operator No: <u>10380</u>	Phone Numbers
Address: <u>PO BOX 8747</u>		Phone: <u>(303) 894-2100</u>
City: <u>PRATT</u> State: <u>KS</u> Zip: <u>67124</u>		Mobile: <u>(303) 905-5341</u>
Contact Person: <u>James Hix - East OWP EPS</u>	Email: <u>james.hix@state.co.us</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33153 Initial Form 27 Document #: 403579066

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 investigation unpermitted earthen pits w/ LOGAN J SAND UNIT #4-19 & NW GRAYLIN PUMP STATION ID1

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>116232</u>	API #: <u></u>	County Name: <u>LOGAN</u>
Facility Name: <u>NW GRAYLIN UNIT</u>	Latitude: <u>40.686169</u>	Longitude: <u>-103.357736</u>	
** correct Lat/Long if needed: Latitude: <u></u>		Longitude: <u></u>	
QtrQtr: <u>SESE</u>	Sec: <u>1</u>	Twp: <u>8N</u>	Range: <u>54W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface?

Other Potential Receptors within 1/4 mile

HPH: no, freshwater ponds ~0.05 mile W, SW, and S; building ~0.10 mil N; DWR Permit #2618F industrial water well owned by The British-American Oil Producing Co. (1960) listed depth to water = 242 ft and total depth = 916 ft (plotted approximately 730 ft NE). This water well is actually located north of the NW Graylin Pump Station ID #1 (~1125 ft north-northeast).

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
UNDETERMINED	SOILS	UNKNOWN	VISUAL, FIELD SCREENING, ANALYTICAL

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

This oil and gas Location is in the Colorado ECMC Orphaned Well Program (OWP). This initial Form 27 is submitted for site investigation activities performed during decommissioning of Oil and Gas Facilities, specifically sampling activities for pits associated with the LOGAN J SAND UNIT #4-19 (Pit #116232) and NW GRAYLIN PUMP STATION ID #1. Field screening will be performed of the four sidewalls and base of the wellhead excavation to investigate for evidence of E&P Waste impacts. At a minimum, soil samples will be submitted to an accredited environmental laboratory for analysis of Table 915-1 parameters for soils that exhibit E&P Waste impact; or from the expected downgradient sidewall in the absence of E&P Waste impact; and from the base of the excavation. Soil samples will be collected and analyzed in accordance with ECMC 900 Series Rules.

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 soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 parameters including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds (metals, soil suitability for reclamation).

Proposed Groundwater Sampling

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

Groundwater samples are not expected to be collected as part of this investigation. If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

Proposed Surface Water Sampling

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

Surface water samples are not expected to be collected as part of this investigation.

Additional Investigative Actions

- ☐ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

No additional alternative investigative actions are expected to be conducted as part of this site investigation.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0

Number of soil samples exceeding 915-1

Was the areal and vertical extent of soil contamination delineated?

Approximate areal extent (square feet)

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1

Vertical Extent > 915-1 (in feet)

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)

Highest concentration of Toluene (µg/l)

Highest concentration of Ethylbenzene (µg/l)

Highest concentration of Xylene (µg/l)

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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

This initial Form 27 presents a site investigation workplan to assess historic pits associated with the LOGAN J SAND UNIT #4-19 and NW GRAYLIN PUMP STATION ID #1. If E&P Waste impacts are encountered during future decommissioning of Oil and Gas Facilities, approximately 10 cubic yards of E&P Waste impacted soils will be excavated, temporarily stockpiled on location, and hauled to a commercial disposal facility.

REMEDIAL ACTION 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 E&P Waste impacted soils are encountered, approximately 10 cubic yards of the E&P Waste impacted soils will be excavated and removed. If the horizontal and vertical extent of the E&P Waste impacts cannot be defined or removed during this initial action, then additional site investigation and remediation will be performed at a later date under an approved supplemental Form 27. Site data will be evaluated and remediation technologies implemented to meet Table 915-1 soil residential screening levels, protection of groundwater screening levels, or Table 915-1 groundwater and WQCC Regulation 41 numeric and narrative levels as applicable to site conditions.

Soil Remediation Summary

☐ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

☐ Ex Situ

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

Supplemental Form 27 - Submitted w/in 90 days of receipt of results.

☐ 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.

The BENCHMARK ENERGY LLC - 10380 NW GRAYLIN D SAND UNIT #19 related pits are in the Colorado ECMC (fka COGCC) Orphaned Well Program. The former Operator's bond, and other funding will be used to Plug and Abandon (PA) the orphaned well, remediate, and reclaim the orphaned oil and gas location.

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

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: _____

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.

The Colorado ECMC OWP will reclaim this oil and gas location in accordance with 1000 Series Rules including grading/recontouring of disturbed areas. The reclamation plan will include the method and testing of compaction alleviation, development of a reseeding program that describes preparation of a new seed bed, seed mix, and noxious weed prevention. This will be performed under a separate scope of work. Final reclamation will be conducted per ECMC 1000 Series Rules and prioritized based on OWP funding and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

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. 01/31/2023

Actual Spill or Release date, or date of discovery. 03/31/2011

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/07/2023

Proposed site investigation commencement. 02/16/2023

Proposed completion of site investigation. 02/16/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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

The BENCHMARK ENERGY LLC - 10380 LOGAN J SAND UNIT-68N54W (Location ID #312168) and Pit #116232 are in the Colorado ECMC Orphaned Well Program. This initial Form 27 is submitted for a site investigation of the pit associated with the LOGAN J SAND UNIT #4-19 (Pit #116232) and other unpermitted earthen pits. Benchmark initiated remediation of the produced water pit associated with the well pad; however, it appears that these pits were also historically associated with the NW Graylin Pump Station ID#1 to the north-northeast (Location ID#450399). This initial Site Investigation and Remediation Workplan is submitted for a site investigation of the former pits.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 11/07/2023

Email: james.hix@state.co.us

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: 12/12/2023

Remediation Project Number: 33153

COA Type**Description**

	OWP shall provide details (depths and locations) of all proposed sample locations within the next Form 27 filing.
	OWP shall indicate the plans behind on-location and off-location flowlines: remove or abandon-in-place.
	OWP shall submit a "Soil Sampling Location Map" that includes: a scale, an aerial photograph that shows the location of field screenings, sample(s), and background sample(s), per Rule 913.h.(4).A..
	OWP shall provide an analytical summary table of all analytical results collected at this location.
	OWP shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. 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)).
5 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**

403579066	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403579192	MAP
403579193	SITE MAP
403588250	CORRESPONDENCE
403622662	FORM 27-INITIAL-SUBMITTED

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)