

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:

403634847

Receive Date:

12/22/2023

Report taken by:

Chris Sanchez

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: EVERGREEN NATURAL RESOURCES LLC	Operator No: 10705	Phone Numbers
Address: 1875 LAWRENCE ST STE 1150		Phone: (719) 2204330
City: DENVER	State: CO	Zip: 80202
Contact Person: Timothy Fernandez	Email: timothy.fernandez@enrllc.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 7766 Initial Form 27 Document #: 200380067

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: PIT	Facility ID: 112874	API #: _____	County Name: LAS ANIMAS
Facility Name: JAN H STATE 14-16	Latitude: 37.166487	Longitude: -104.682242	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSW	Sec: 16	Twp: 33S	Range: 65W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use NON CROP LAND

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes

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	pit	sampling and 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.

Produced water from this well was being stored in this offsite pond. The well is no longer going to the pond.

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):

One grab sample was collected inside the pit in the area of highest impact and was analyzed for full Table 915-1 analytes. Two additional grab samples were collected inside the pit and analyzed for Soil Suitability for Reclamation analytes and metals.

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 4

Number of soil samples exceeding 915-1 0

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

Approximate areal extent (square feet) 17500

-- Highest concentration of TPH (mg/kg) 31.2

-- Highest concentration of SAR 2.88

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

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?

One native background sample was collected and analyzed for Soil Suitability for Reclamation analytes and metals.

☐ 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.

Produced water is not being sent to this pond and it is no longer needed. All flowlines have been removed. No contaminants were identified within the pit.

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 request to terminate the permit for this offsite pit was submitted by the previous operator. The landowner representative, Mr. Kit Page (as well as Steve Freese), has requested that the existing offsite pond to the southeast of this location be left in its current state for precipitation to collect for livestock and/or wildlife watering. After further investigation, it was determined that the pit existed as a pond prior to operations. A Form 4 (Doc # 403595515) was approved and acknowledged that the pit existed prior to operations, therefore the pit will be left in its prior condition.

Soil Remediation Summary

☒ In Situ

☐ Ex Situ

No Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

No Chemical oxidation

If Yes: Estimated Volume (Cubic Yards)

No Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID #

☐ Yes Natural Attenuation
☐ Other _____

☐ 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.

Remaining costs for remediation of this pit are expected to be <\$1000. Operator's general liability insurance and Financial Assurance covers these operations entirely. No claim is anticipated for this spill remediation. Operator does not have site-specific financial assurance for this project, however Operator has inactive well, blanket and surface bonding, as well as commercial general liability and/or umbrella/excess insurance meeting the requirements of 705.b. Operator does not anticipate making an insurance claim for this report. Assessment activities as outlined herein are proposed. Costs included herein are estimates only and they may change over time base on numerous factors. Accordingly, Operator makes no guarantee as to the accuracy of such cost estimates, thus providing that estimate for the next year below.

Operator anticipates the remaining cost for this project to be: \$ 1000

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:

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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 further investigation, it was determined that the pit existed as a pond prior to operations. A Form 4 (Doc # 403595515) was approved and acknowledged that the pit existed prior to operations, therefore the pit can be left in its prior condition. No reclamation is necessary at this location.

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. 05/09/2013

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/09/2013

Proposed site investigation commencement. 05/09/2013

Proposed completion of site investigation. 12/22/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/09/2013

Proposed date of completion of Remediation. 12/22/2023

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

This Form 27 is being submitted as a request for closure of the Jan H State 14-16 Offsite Pit remediation Project #7766. Soils samples collected within the pit were found to be compliant with Table 915-1 standards. Previous Form 27 stated the operators intent to leave the pit open as requested by a representative of the state land board. After further investigation, it was determined that the pit existed as a pond prior to operations, as seen in the attached historical aerial image. A Form 4 (Doc # 403595515) was filed and approved which acknowledged that the pit existed prior to operations, therefore the pit can be/will be left in its pre-existing condition.

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

Signed: Timothy Fernandez

Title: Regulatory Supervisor

Submit Date: 12/22/2023

Email: timothy.fernandez@enrllc.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: Chris Sanchez

Date: 01/08/2024

Remediation Project Number: 7766

COA Type**Description**

0 COA	

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**

403634847	FORM 27-SUPPLEMENTAL-SUBMITTED
403634919	ANALYTICAL RESULTS
403634921	AERIAL IMAGE
403634922	SOIL SAMPLE LOCATION MAP
403634923	ANALYTICAL RESULTS
403634924	OTHER
403634927	PHOTO DOCUMENTATION

Total Attach: 7 Files

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

Environmental	Form 4 Document # 403595515 has the following comments; The 1993 aerial imagery indicates the offsite pit existed prior to the existence of the well site. A field inspection will be performed to evaluate offsite pit conditions. All associated piping to the pit must be disconnected and removed. Approval of the form 4 acknowledges that the COGCC has received this Notice. A field inspection will be performed to evaluate compliance with the reclamation requirements	01/05/2024
Environmental	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.	01/05/2024
Environmental	Based on the information presented, it appears that no further remedial action is necessary at this time and the ECMC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.	01/05/2024

Total: 3 comment(s)