

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

403649912

Receive Date:

01/10/2024

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: CENTRAL OPERATING INC	Operator No: 14855	Phone Numbers
Address: 1600 BROADWAY STE 1050		Phone: (303) 929-9513
City: DENVER	State: CO	Zip: 80202
Contact Person: Cullin Johnson	Email: coidenverproduction@gmail.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32117 Initial Form 27 Document #: 403540591

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: 117567	API #: _____	County Name: WASHINGTON
Facility Name: MARICK A-1	Latitude: 39.823931	Longitude: -103.183490	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 3	Twp: 3S	Range: 52W
Meridian: 6	Sensitive Area? Yes		

Facility Type: PIT	Facility ID: 117568	API #: _____	County Name: WASHINGTON
Facility Name: MARICK A-1	Latitude: 39.824248	Longitude: -103.183549	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 3	Twp: 3S	Range: 52W
Meridian: 6	Sensitive Area? Yes		

Facility Type:	LOCATION	Facility ID:	317092	API #:		County Name:	WASHINGTON
Facility Name:	MARICK-63S52W 3SENE	Latitude:	39.822589	Longitude:	-103.184897		
		** correct Lat/Long if needed: Latitude:		Longitude:			
QtrQtr:	SENE	Sec:	3	Twp:	3S	Range:	52W
				Meridian:	6	Sensitive Area?	Yes

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Agricultural/crop land

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? No

Other Potential Receptors within 1/4 mile

Nearby croplands ~40' north of northern pit, creek ~950' south of the southern pit.

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	GROUNDWATER	NA	Laboratory analysis if encountered
UNDETERMINED	SOILS	TBD	Laboratory analytical results

INITIAL ACTION SUMMARY

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

The Marick Location, and associated Marick A-1 Pits (North and South) and Tank Battery will be decommissioned in accordance with ECOM Rule 911.a. and ECOM Rule 913.c.(1). Soil and groundwater (if encountered) samples will be collected and submitted for laboratory analysis to determine if concentrations and values are in compliance with ECOM Table 915-1. Visual inspection and field screening of soils around the tank battery and the N&S Marick A-1 Pits will be conducted during sampling activities. The topographic Site Location Map showing the geographic setting of the site is provided.

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):

Following facility decommissioning activities, discrete soil samples will be collected from the surfaces and excavation areas underneath the separator, three above ground storage tanks, and within the north and south pits. In the absence of apparent impacts, soil samples will be submitted to an accredited laboratory for analysis for benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, total petroleum hydrocarbons (TPH) - gasoline range organics (GRO:C6-C10) by USEPA Method 8260D, TPH - diesel range organics (DRO:C10-C28) and oil range organics (ORO: C28-C40) by USEPA Method 8015D, pH, specific conductance (EC), sodium adsorption ratio (SAR) by saturated paste method, and boron by hot water soluble soil extract method. 2 background samples will be collected at locations of comparable, nearby, non-impacted native soil. Proposed soil sample locations are provided.

Proposed Groundwater Sampling

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

If groundwater is encountered during facility decommissioning activities, a minimum of one grab sample will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene, using standard methods appropriate for detecting the target analytes in ECOM 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):

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? No

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?

This is a quarterly progress report. Operator was unable to start site investigation activities, the schedule of assessment activities has been updated in the form. Operator is requesting an extension for decommissioning and site investigation due to contractor availability and cold weather.

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.

NA

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.

NA

Soil Remediation Summary☐ In Situ☐ Ex Situ

Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards)

_____ 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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other 90 days after work if completed.

☐ 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.

Central Operating, Inc. has complied with General Liability Insurance requirements per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation.

Operator anticipates the remaining cost for this project to be: \$ 10000

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.

The site will be reclaimed with ECMC 1000 Series Reclamation Rules per surface owner direction.

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. 03/01/2025

Proposed date of completion of Reclamation. 03/01/2026

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. 09/08/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/16/2023

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

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

This supplemental is to update commencement of decommissioning due to contractor availability and cold weather. Production oil tank is still full of oil and will need to be heated for oil to go to sales. Operator is requesting for this to be extended to 3/13/2024. The wellhead associated with this location has been plugged and assessed with request for no further action pending approval, Document #403583273.

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

Signed: Amber Barnett

Title: Compliance Specialist

Submit Date: 01/10/2024

Email: abarnett@ardorenvironmental.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: 02/28/2024

Remediation Project Number: 32117

COA Type**Description**

	As stated in Doc# 403540591, If groundwater is encountered, Operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) and organic compounds in groundwater.
	As stated in Doc# 403540591, Operator shall conduct a closure investigation in accordance with Rule 911.c. Pit Closure Guidance Document.
	As stated in Doc# 403540591, Operator 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)).
3 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**

403649912	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403701815	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

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

Environmental	Remediation #31790 includes wellhead and flowline decommissioning activities. Remediation #32117 (this form) includes pits and location decommissioning.	02/28/2024
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Total: 1 comment(s)