

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Report taken by:

Jason Kosola

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 ECMC 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: SIMCOE LLC	Operator No: 10749	Phone Numbers Phone: (970) 976-7356 Mobile: ()
Address: 1199 MAIN AVE SUITE 101		
City: DURANGO State: CO Zip: 81301		
Contact Person: Kyle Siesser	Email: ksiesser@cottonwoodconsulting.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28914 Initial Form 27 Document #: 403306990

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: SPILL OR RELEASE	Facility ID: 483355	API #: _____	County Name: LA PLATA
Facility Name: Florida River Plant dehy tank relea	Latitude: 37.156532	Longitude: -107.778232	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESW	Sec: 25	Twp: 34N	Range: 9W Meridian: M Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Agricultural

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

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	400	Estimation based on visual assessment at the time of spill and soil samples

INITIAL ACTION SUMMARY

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

Operations personnel discovered wet area and immediately shut in tank and equipment. Recovery of standing fluids performed by onsite personnel with a pump, pumping fluids into the water pipeline. Measurement and sampling of wet area performed. Samples were collected and submitted to the laboratory for analysis of ECMC Table 915 standards.

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):

Five initial soil samples were collected in the wet area and one intimal background sample collected to the north of the facility off of the disturbance on 12/2/2022. All samples collected from the wet area were grab samples 0-6 inches in depth. Three additional soil samples were collected 6/7/2023 for analysis of arsenic. All initial soil samples were below their respective ECMC Table 915 standards with the exception of arsenic, which was elevated above the ECMC Table 915 Standard in the northeast corner. Soils in the northeast corner were remediated with SA-1000. Follow-up sampling was conducted 8/17/2023 and one confirmation soil sample (SS07) was collected from the remediation area and three background soil samples (BG01-BG03) were collected from areas outside the project area.

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

Number of soil samples collected 12
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 400

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 5.05
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 _____

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?

Four background soil samples were collected from nearby, non-impacted native soil to establish background concentrations. SS06 is a background sample collected north of the location. BG01, BG02, and BG03 were collected south, east, and west of the site, respectively. Background samples indicated arsenic values above the ECOM Table 915-1 standards. It is requested that background concentrations of arsenic be considered when evaluating the site for final closure.

☐ 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 NE corner of the spill area is the only area to be addressed. The remainder of the spill area samples returned below the 915 threshold. Impacted materials in the NE corner as marked on the map were tilled, treated with SA1000 mixture, and tilled again.

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 area in the NE corner of the release is the only area needing remediation for elevated arsenic. The area was remediated in situ with 25 gallons of SA1000. The area was tilled to alleviate compaction. The SA1000 treatment was applied to all soils. This process will be repeated until the soils 6-10 inches deep have been thoroughly treated.

Soil Remediation Summary

☒ In Situ

☐ Ex Situ

☐ Bioremediation (or enhanced bioremediation)

☐ Chemical oxidation

☐ Air sparge / Soil vapor extraction

☐ Natural Attenuation

☐ Yes ☐ Other 25 gallons of SA1000 solution
tilled into the soils.

☐ 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

☐ No ☐ Bioremediation (or enhanced bioremediation)

☐ No ☐ Chemical oxidation

☐ No ☐ Air sparge / Soil vapor extraction

☐ No ☐ Natural Attenuation

☐ No ☐ 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

Annual monitoring with reduction of analyte to Arsenic only in the NE area is requested. All other areas samples returned below the standards threshold.

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.

SIMCOE's current general liability insurance limit is adequate to cover this project; however, no claim is anticipated for this effort. This active wellsite and production facilities are anticipated to produce for 20+ years. No additional financial assurance is required for this project. SIMCOE's Form 3 application has been submitted according to guidelines and is currently under review by the COGCC. SIMCOE's corporate officer has provided a certification of financial capability.

Operator anticipates the remaining cost for this project to be: \$ 4000

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

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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 ECMC 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.

There will be no reclamation on this spill / remediation area. The area is within the active operating area and will remain as is without reclamation. Upon approval of spill closure the area will be re-compacted to aid in ground stability adjacent to active equipment.

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.

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/23/2022

Proposed site investigation commencement. 11/23/2022

Proposed completion of site investigation.

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/01/2023

Proposed date of completion of Remediation. 10/02/2023

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

Background samples indicated arsenic values above the ECMC Table 915-1 standards. It is requested that background concentrations of arsenic be considered when evaluating the site for final closure.

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

Signed: Kyle Siesser

Title: Consultant

Submit Date: 10/02/2023

Email: ksiesser@cottonwoodconsulting.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Jason Kosola

Date: 03/18/2024

Remediation Project Number: 28914

COA Type

Description

	<p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if 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.</p> <p>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.</p> <p>Based on the Operator's assessment of background conditions at the subject location, arsenic results for confirmation soil samples appear to be representative of background as opposed to E&P activities. Therefore, the Operator's demonstration of background will be accepted as an alternative to the default standard in ECMC's Table 915-1.</p>
1 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
403547038	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403547070	MAP
403547120	ANALYTICAL RESULTS
403547121	ANALYTICAL RESULTS
403547123	PHOTO DOCUMENTATION
403547125	ANALYTICAL RESULTS
403722426	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)