

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

403637278

Receive Date:

03/27/2024

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 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: CORAL PRODUCTION CORP	Operator No: 20275	Phone Numbers
Address: 1600 STOUT ST STE 1500		Phone: (303) 623-3573
City: DENVER	State: CO	Zip: 80202
Contact Person: Steve Chonka	Email: schonka08@gmail.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21402 Initial Form 27 Document #: 402908271

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: WELL	Facility ID: _____	API #: 121-06740	County Name: WASHINGTON
Facility Name: JOST A 2	Latitude: 40.040220	Longitude: -103.375290	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 24	Twp: 1N	Range: 54W
Meridian: 6	Sensitive Area? No		

Facility Type: PIT	Facility ID: 101073	API #: _____	County Name: WASHINGTON
Facility Name: JOST "A"	Latitude: 40.044177	Longitude: -103.376033	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 24	Twp: 1N	Range: 54W
Meridian: 6	Sensitive Area? Yes		

Facility Type: <u>PIT</u>	Facility ID: <u>101074</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>JOST "A"</u>		Latitude: <u>40.040145</u>	Longitude: <u>-103.375165</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>24</u>	Twp: <u>1N</u>	Range: <u>54W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>PIT</u>	Facility ID: <u>101075</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>JOST "A"</u>		Latitude: <u>40.040145</u>	Longitude: <u>-103.375165</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>24</u>	Twp: <u>1N</u>	Range: <u>54W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>317028</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>JOST A-61N54W 24SWNW</u>		Latitude: <u>40.040145</u>	Longitude: <u>-103.375145</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>24</u>	Twp: <u>1N</u>	Range: <u>54W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications OH Most Sensitive Adjacent Land Use PASTURELAND, DRY LAND FARMING

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

Other Potential Receptors within 1/4 mile

- Unnamed drainage 500 ft east
 - Domestic water well located 930 feet northeast (Permit #118715-Well Constructed)
 - The COAs for approved Form 27-S Doc #403433475 included the statement "Location lies withing the following mapped High Priority Habitat(s): - Designated Basin." However, during review of the ECMC GIS Online Map, the site does not appear to be mapped within a Designated Basin or any other mapped High Priority Habitats.

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	Unknown	lab 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.

Site investigation activities for facility decommissioning have been performed as described in previous Form 27 document . This Form 27 details groundwater monitoring for quarter four of 2023. The laboratory analytical reports are included as an attachment and the analytical data are summarized on the attached summary tables. Additionally, based on conversations with ECMC personnel, previously approved methods that have widely been accepted for remediation and reclamation of SAR impacted soil will no longer be accepted. Therefore, Coral Production Company has been consulting with reclamation experts and evaluating SAR treatment methods for potential presentation to the ECMC in lieu of excavation and disposal of SAR impacted soil.

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):

Per the COA's provided in Form 27-S document #403321814, additional soil sampling for inorganics, organics, metals, and PAH are required. Proposed soil sample locations were attached to a supplemental Form 27 submitted on December 12, 2023 (Document #403527411). Soil samples will be collected and submitted to a NELAP accredited laboratory. Results of the soil sampling investigation will be provided in a Form 27-Supplemental report within 90 days from the submittal date of this report.

Proposed Groundwater Sampling

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

Five (5) groundwater monitoring wells were installed on August 17, 2023. Fourth quarter 2023 groundwater monitoring activities were performed on December 12, 2023, and the results are summarized in the attached analytical summary tables, site figures, and laboratory analytical report. Groundwater samples will be collected on a quarterly basis and submitted for laboratory analysis of the Table 915-1 list of groundwater analytes until four consecutive quarters of data are returned below the regulatory standards. First quarter 2024 groundwater monitoring is scheduled for March 2023 and the results will be submitted in a Form 27-Supplemental report within 90-days from the submittal date of this report.

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 51

Number of soil samples exceeding 915-1 12

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 2500

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 60.2

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 22

Groundwater

Number of groundwater samples collected 5

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 33

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

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?

Three proposed soil sample locations were attached to a supplemental Form 27 submitted on December 12, 2023 (Document #403527411). Soil samples will be collected and submitted to a NELAP accredited laboratory. Results of the soil sampling investigation will be provided in a Form 27-Supplemental report within 90 days from the submittal date of this report.

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 30

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Groundwater samples will be collected on a quarterly basis and submitted for laboratory analysis of the Table 915-1 list of groundwater analytes until four consecutive quarters of data are returned below the regulatory standards. First quarter 2024 groundwater monitoring is scheduled for March 2023 and the results will be submitted in a Form 27-Supplemental report within 90-days from the submittal date of this report.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Remediation of impacted material, if present, will be assessed subsequent to the supplemental investigation activities described herein.

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.

A remediation plan, if required, will be developed once the extent of impacts are delineated

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 30

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

_____ 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.

Five (5) groundwater monitoring wells were installed on August 17, 2023. Fourth quarter 2023 groundwater monitoring activities were performed on December 12, 2023, and the results are summarized in the attached analytical summary tables, site figures, and laboratory analytical report. Groundwater samples will be collected on a quarterly basis and submitted for laboratory analysis of the Table 915-1 list of groundwater analytes until four consecutive quarters of data are returned below the regulatory standards.

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 Confirmation Soil Samples

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.

General Liability insurance coverage of \$1,000,000 per occurrence. \$60,000 bond F/B/o COGCC.

Operator anticipates the remaining cost for this project to be: \$ 25000

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:

Soil was transported and disposed of at the Pawnee Waste Landfill Facility.

Volume of E&P Waste (solid) in cubic yards 30

E&P waste (solid) description Soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Pawnee Waste Landfill

Volume of E&P Waste (liquid) in barrels 0

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? 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 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.

Contingent on supplemental soil sampling activities as described herein, a reclamation plan will be submitted to the COGCC for approval and in accordance with Rule 915.b.

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. 09/01/2023

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). 02/02/2022

Proposed site investigation commencement. 08/09/2023

Proposed completion of site investigation. 05/01/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/01/2024

Proposed date of completion of Remediation. 07/01/2024

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

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

Signed: Drezden Kinnaird

Title: Consultant

Submit Date: 03/27/2024

Email: dkinnaird@cgrs.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: Krystal Heibel

Date: 06/05/2024

Remediation Project Number: 21402

COA Type**Description**

	Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater.
	Operator shall clarify the remediation plan within the next submittal. "Additionally, based on conversations with ECMC personnel, previously approved methods that have widely been accepted for remediation and reclamation of SAR impacted soil will no longer be accepted. Therefore, Coral Production Company has been consulting with reclamation experts and evaluating SAR treatment methods for potential presentation to the ECMC in lieu of excavation and disposal of SAR impacted soil."
	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.
	Operator shall check the box for "Rule 913.c.(1): Pit or Cuttings Trench closure" within the next submittal.
4 COAs	

ATTACHMENT 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**

403637278	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403637499	ANALYTICAL RESULTS
403637504	ANALYTICAL RESULTS
403637506	GROUND WATER ELEVATION MAP
403637507	GROUND WATER SAMPLE LOCATION
403730613	ANALYTICAL RESULTS
403814497	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Per Doc# 403527411, "The upgradient well MW-02 is representative of background conditions and demonstrated inorganic compound concentrations of 510 mg/L for TDS, 63.8 mg/L for chloride, and 202 mg/L for sulfate. Based on the analytical data from MW-02, the TDS and chloride concentrations at MW-01 and MW-04 are above Table 915-1 standards. The sulfate concentration at MW-03 was above the Table 915-1 standard." Groundwater flow is illustrated as flowing due North."	06/05/2024
Environmental	Per Doc# 402908271, "Soil sampling will be conducted at the pit location, treater pad, tank battery, and wellhead pad. Samples will be analyzed for TPH and BTEX. Grab sample will be taken at the pit area for the pit bottom and grab samples for the pit banks. 2 composite samples will be taken from a grid at the tank battery. One composite sample each will be taken from the treater pad and wellhead. One composite sample each will be taken for inorganics at the tank battery and pit and analyzed for EC, SAR, pH and boron. One background sample will be taken for inorganics."	06/05/2024

Total: 2 comment(s)