

State of Colorado
Oil and Gas Conservation Commission



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#8432

FOR OGCC USE ONLY

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5/14/2014

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

OGCC Employee:

- Spill Complaint
 Inspection NOAV

Tracking No:

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

- Spill or Release Plug & Abandon Central Facility Closure Site/Facility Closure Other (describe): Pit Closure

OGCC Operator Number: <u>10323</u>	Contact Name and Telephone: <u>Kristen Stocks</u>
Name of Operator: <u>Entek GRB, LLC</u>	No: <u>(307) 200-1930</u>
Address: <u>535 16th Street, Suite 620</u>	Fax: <u>(866) 435-9424</u>
City: <u>Denver</u> State: <u>CO</u> Zip: <u>80202</u>	

API Number: <u>05-081-07232</u>	County: <u>Moffat</u>
Facility Name: <u>Robidoux Pit</u>	Facility Number: <u>13-7</u>
Well Name: <u>Robidoux</u>	Well Number: <u>Robidoux 13-7</u>
Location: (QtrQtr, Sec, Twp, Rng, Meridian): <u>SWNE 13, 21N, 89W, 6th</u>	Latitude: <u>40.995334</u> Longitude: <u>-107.325237</u>

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Residual drilling materials

Site Conditions: Is location within a sensitive area (according to Rule 901e)? Y N If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): rural residential

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: _____

Potential receptors (water wells within 1/4 mi, surface waters, etc.): none

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):	Extent of Impact:	How Determined:
<input checked="" type="checkbox"/> Soils	<u>Residual drilling materials contained within lined pit</u>	<u>Reported by others</u>
<input type="checkbox"/> Vegetation	_____	_____
<input type="checkbox"/> Groundwater	_____	_____
<input type="checkbox"/> Surface Water	_____	_____

REMEDIATION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

The Robidoux 13-7 drilling pit was likely backfilled without an approved Closure Plan. Residual drilling materials may be present in the former pit and native soils beneath the bottom of the former pit may be impacted with petroleum product. To determine if petroleum impacted drilling materials or soils are present, the former pit location shall be identified (approximately 60' x 100') and five borings shall be advanced within the former pit footprint. Figure 1 illustrates the general location of the pit based on COGCC recorded lat/long of the wellhead and 5 proposed boring locations from historical Google Earth photos. The borings will be advanced using a Simco 2800 HSHT rig (4" solid stem auger) and split spoon samples will be collected at 1.5-2.0' intervals. The borings will be advanced from ground surface to a minimum of 2' below the bottom of the pit. The split spoon samples will be photographed and visually inspected for petroleum and/or petroleum staining. If petroleum and/or petroleum staining is observed, sample(s) will be collected and analyzed for total petroleum hydrocarbons (TPH). If sample analysis results indicate concentrations of greater than 500 mg/kg of TPH in the backfilled material, residual drilling material (if present) or native soils, a Closure Plan that may include pit excavation, material mixing and sampling of Table 910-1 parameters prior to backfilling.

Describe how source is to be removed:

An additional approved plan will be needed from the State if TPH results are greater than 500 mg/kg.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

If further remediation is necessary, it will be performed in accordance with an approved Closure Plan.



Tracking Number: Name of Operator: OGCC Operator No: Received Date: Well Name & No: Facility Name & No:

REMEDIATION WORKPLAN (Cont.)

OGCC Employee:

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

No groundwater impact anticipated.

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. Use additional sheet for description if required.

If the results of the sampling program indicate that no further action is required, additional reclamation may not be required. If the sampling program results require further action, a Closure Plan shall be prepared that includes provisions for reclamation the former pit location.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? [] Y [] N If yes, describe:

TBD

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

TBD

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: 5/1/14 Date Site Investigation Completed: 5/12/14 Date Remediation Plan Submitted: TBD Remediation Start Date: TBD Anticipated Completion Date: TBD Actual Completion Date:

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

Print Name: Kristen Stocks Signed: [Signature] Title: Sr. Engineer Date: 5/12/14

OGCC Approved: Kris Neidel (Kris Neidel) Title: Environmental Protection Specialist Date: 5/16/2014

See DATA Entered Form 27 for COA's

Figure 1

