

# State of Colorado Oil and Gas Conservation Commission

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402372025

Receive Date:

04/16/2020

Report taken by:

RICK ALLISON

## Site Investigation and Remediation Workplan (Initial 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.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

### OPERATOR INFORMATION

Name of Operator: <u>GREAT WESTERN OPERATING COMPANY LLC</u>	Operator No: <u>10110</u>	<b>Phone Numbers</b>
Address: <u>1001 17TH STREET #2000</u>		Phone: <u>(720) 595-2132</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jason Davidson</u>	Email: <u>j davidson@gwp.com</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 15435Initial Form 27 Document #: 402372025

#### PURPOSE INFORMATION

- |  |  |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water                   |
| <input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure                             | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation                 | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project                                  |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste                      | <input type="checkbox"/> Rule 906.c.: Director request   |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____   |

#### SITE INFORMATION

N Multiple Facilities ( in accordance with Rule 909.c. )

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>441861</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Pierce Unit Central Tank Battery</u>		Latitude: <u>40.643635</u>	Longitude: <u>-104.756987</u>
<u>441861</u>			
** correct Lat/Long if needed: Latitude: <u>40.643836</u>		Longitude: <u>-104.757313</u>	
QtrQtr: <u>SESE</u>	Sec: <u>22</u>	Twp: <u>8N</u>	Range: <u>66W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

#### SITE CONDITIONS

General soil type - USCS Classifications CLMost Sensitive Adjacent Land Use AgriculturalIs domestic water well within 1/4 mile? YesIs surface water within 1/4 mile? YesIs groundwater less than 20 feet below ground surface? No

#### Other Potential Receptors within 1/4 mile

Pierce Lateral in place 75 feet to the northwest. Rural residential development in place across US HWY 85, 1,000 feet to the east. Rural residential property in place 1,100 feet to the southwest

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             |  |
| <input checked="" type="checkbox"/> Oil            | <input type="checkbox"/> Tank Bottoms                |  |
| <input type="checkbox"/> Condensate                | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids           | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings            | <input type="checkbox"/> Spent Filters               |  |
|  | <input type="checkbox"/> Pit Bottoms                 |  |
|  | <input type="checkbox"/> Other (as described by EPA) |  |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	Unknown	Not yet determined

## INITIAL ACTION SUMMARY

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

On 2/20/20, a triplex pump froze and the overflow alarm malfunctioned on two produced water tanks, resulting in the release of approximately 15 bbls of oil and 250 bbls of water. All but approximately 3 bbls were contained within the unlined, earthen bermed secondary containment. The entire release was contained on location. Between 2/20/20 and 2/21/20, hydrovac equipment was used to remove four loads of standing liquids and impacted roadbase from the release area. Between 2/21/20 and 2/22/20, a backhoe was used to excavate an additional 140 cubic yards of impacted roadbase and soil from the release area. The impacted material was manifested and hauled offsite for proper disposal. On 2/25/20, a pothole investigation was conducted using a hydrovac to determine vertical and horizontal extent of hydrocarbon-impacted soils at the Site. Thirty-two potholes were excavated in the release area to depths ranging from 12 inches to 48 inches below ground surface (bgs). Initial visual and olfactory observations and photoionization detector (PID) readings indicated the presence of potential hydrocarbon-impacts in the natural clay soil beneath the roadbase. Potential impacts were also observed in the flow path to the south and west of the southeast corner of the secondary containment where liquids had breached the earthen berm. Based on these findings, further investigation is needed to delineate the extent of potentially impacted soil at the Site. No soil samples were submitted for laboratory analysis during the pothole investigation and groundwater was not encountered. Please refer to the attached Figure 2 for an illustration of the Site layout and hydrovac pothole locations. Copies of the waste manifests are attached.

## 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 ):

Great Western proposes to conduct a hand auger investigation to delineate the vertical and horizontal extent of hydrocarbon-impacted soil at the Site. Eleven soil borings will be advanced across the Site. Based on field observations, one soil sample will be collected from each soil boring for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), Total Petroleum Hydrocarbons (TPH)- Gasoline Range Organics (GRO) and TPH-Diesel Range Organics (DRO). Please refer to the attached Figure 2 for an illustration of the proposed hand auger boring locations.

### 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 0

Number of soil samples exceeding 910-1

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 > 910-1

Vertical Extent > 910-1 (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 910-1

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 910-1

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) 140

Volume of liquid waste (barrels) 300

☒ Is further site investigation required?

Please refer to the Proposed Soil Sampling Plan section under the Site Investigation Plan tab of this Form 27.

# REMEDIAL ACTION PLAN

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Great Western will either dig and haul or treat any soils onsite that exceed Table 910-1 concentration levels.

## 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 or closure plan will be developed based on the results of the proposed site investigation.

## Soil Remediation Summary

### ☐ In Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

### ☐ Ex Situ

\_\_\_\_\_ 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

☐ \_\_\_\_\_ 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.

Groundwater was not encountered during the pothole investigation.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Following site investigation activities

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Site Investigation Report

### 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:

None

Volume of E&P Waste (solid) in cubic yards 140

E&P waste (solid) description Hydrocarbon-impacted roadbase and soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Waste Management's North Weld Landfill in Ault, CO

Volume of E&P Waste (liquid) in barrels 300

E&P waste (liquid) description Hydrocarbon-impacted roadbase and soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Pawnee Waste Landfill in Grover, CO

## 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.

If necessary, the site will be reclaimed in accordance with COGCC 1000 series rules.

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 approve the seed mix? \_\_\_\_\_

If NO, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. 02/20/2020

Actual Spill or Release date, if known. 02/20/2020

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/20/2020

Date of commencement of Site Investigation. 02/25/2020

Date of completion of Site Investigation.

### REMEDIAL ACTION DATES

Date of commencement of Remediation.

Date of completion of Remediation.

### SITE RECLAMATION DATES

Date of commencement of Reclamation.

Date of completion of Reclamation.

### OPERATOR COMMENT

The proposed site investigation activities are planned to be conducted within 45 days of approval of this Form 27.

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

Signed: Jason Davidson

Title: Senior EHS Specialist

Submit Date: 04/16/2020

Email: jdavidson@gwp.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: RICK ALLISON

Date: 04/17/2020

Remediation Project Number: 15435

### COA Type

### Description

	Implement site investigation within 45 days (June 1, 2020) as proposed and report results within 45 days thereafter (July 16, 2020).
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### 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.

<u>Att Doc Num</u>	<u>Name</u>
402372025	FORM 27-INITIAL-SUBMITTED
402372952	DISPOSAL MANIFESTS
402372954	SOIL SAMPLE LOCATION MAP
402372963	DISPOSAL MANIFESTS
402372965	DISPOSAL MANIFESTS
402372966	DISPOSAL MANIFESTS
402372967	DISPOSAL MANIFESTS

Total Attach: 7 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)