

State of Colorado Oil and Gas Conservation Commission

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402628771

Receive Date:

06/27/2021

Report taken by:

Steven Arauza

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 285-2720
City: DENVER State: CO Zip: 80202		Mobile: (970) 778-2314
Contact Person: Jake Janicek	Email: jjanicek@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 19700 Initial Form 27 Document #: 402628771

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: LOCATION	Facility ID: 316323	API #: _____	County Name: RIO BLANCO
Facility Name: Scandard Draw 3-14	Latitude: 39.792520	Longitude: -108.250248	
** correct Lat/Long if needed: Latitude: 39.792664		Longitude: -108.250125	
QtrQtr: SENW	Sec: 14	Twp: 3S	Range: 97W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Shrubland

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

Willow Creek is approximately 288 feet west of the location.

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	SOILS	To be determined	To be determined through on-site investigation

INITIAL ACTION SUMMARY

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

Please refer to COGCC document number 2222545 for immediate actions taken to abate, investigate, and remediate impacts associated with the historical spill. Laboratory results of initial soil samples collected from the release area indicate compliance with COGCC Table 910-1 except for EC, SAR, and arsenic. Arsenic concentrations in the spill characterization soil samples are within naturally occurring background concentrations at the site. Laboratory reports of background samples are attached and summarized on the attached table. The attached laboratory reports are presenting background data only. The other spill samples included on the laboratory reports are associated with a 2015 release (Spill/Release Point 443303) that is closed, and a second release being tracked under REM 9346. Those samples are not relevant to this spill.

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):

Please see the attached Spill Investigation Site Diagram for proposed soil sampling points. These were selected to characterize the approximate spill area of the reported spill. Caerus will collect soil samples from each location between six (6) and 12 inches below ground surface (bgs) and 18 to 24 inches bgs. Each sample will be field-screened with visual and olfactory observations and a photo-ionization detector (PID) to identify potentially impacted soil. Investigated soil will also be photographed to document presence/absence of soil staining. Under COGCC Rule 915.f, Caerus requests the Director's permission to comply with the version of Table 910-1 that was previously in effect if Remediation is completed by January 15, 2022. Based on laboratory results of initial spill characterization samples collected on 01/19/2012, and existing arsenic background concentrations at the site, Caerus is requesting a reduced analyte suite of EC and SAR.

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 915-1

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

Approximate areal extent (square feet) 600

NA / ND

-- Highest concentration of TPH (mg/kg) 9.8

-- Highest concentration of SAR 20

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 0

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?

Based on internal document review and proposed spill investigation results, background soil samples will be collected at the location. Background data will be presented in a supplemental Form 27.

☐ 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 Remediation Workplan includes a proposed spill investigation plan. With approval and weather permitting, investigation activities will be conducted, and results will be reported in a supplemental Form 27.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

With approval of Rule 915.f allowing clearance under Table 910-1, if investigation activities identify concentrations of analytes exceeding COGCC Table 910-1 Concentration Levels, additional site investigation activities and remedial actions will be proposed in a supplemental Form 27.

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.

With approval of Rule 915.f allowing clearance under Table 910-1, if investigation activities identify concentrations of analytes exceeding COGCC Table 910-1 Concentration Levels, additional site investigation activities and remedial actions will be proposed in a supplemental Form 27.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

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

_____ 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.

REMEDATION 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

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:

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.

Any disturbance will be returned to the active working surface of the location for continued operation. When the site is decommissioned at a later date, it will be reclaimed in accordance with 1000 Series regulations.

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.

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. 01/18/2012

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/16/2021

Proposed site investigation commencement. 05/01/2021

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

With Form 27 approval and remediation project number assignment, Caerus requests closure of COGCC Spill Document Number 2222545 as subsequent site investigation and remediation work will proceed under the assigned remediation project number.

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

Signed: Chris McKisson

Title: Sr. Project Manager

Submit Date: 06/27/2021

Email: chris.mckisson@confluence-cc.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: Steven Arauza

Date: 08/20/2021

Remediation Project Number: 19700

Condition of Approval

COA Type

Description

	Operator shall comply with Rule 915.e.(2).B by collecting samples from areas most likely to have been impacted and by collecting an appropriate number of representative soil samples to delineate the horizontal and vertical extents of contamination.
	Based on the information provided, the Operator's request to proceed under Table 910-1 is conditionally approved pursuant to Rule 915.f. Per Rule 915.f, if the remediation is not completed by January 15, 2022, then the Operator will comply with the current version of Table 915-1.

	<p>Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 910-1 for soil and groundwater. The Operator shall analyze soil samples for the approved reduced analyte suite of EC and SAR.</p> <p>If groundwater is encountered during remediation activities, the Operator shall comply with Table 915-1 using the Protection of Groundwater Soil Screening Level Concentrations.</p>
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.

<u>Att Doc Num</u>	<u>Name</u>
402628771	FORM 27-INITIAL-SUBMITTED
402629121	SOIL SAMPLE LOCATION MAP
402629125	MAP
402629711	ANALYTICAL RESULTS
402630663	ANALYTICAL RESULTS
402630664	ANALYTICAL RESULTS

Total Attach: 6 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Based on the information provided, the Operator's request for consideration of background arsenic concentrations is conditionally approved.	04/21/2021
Environmental	<p>Updated Correct Lat/Long based on spill path depicted in attached doc #402629121 and COGCC GIS Online map viewer.</p> <p>Note to Operator: Correct Lat/Long must be provided to correspond to the project area. Do not leave the default lat/long for the related location on the Form 27 unless the coordinates correspond to the site investigation area.</p>	04/21/2021

Total: 2 comment(s)