

State of Colorado
Oil and Gas Conservation Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109

FOR OGCC USE ONLY

Rec 7/22/16
Doc# 200440047
Rem #9791

OGCC Employee:

Spill Complaint
 Inspection NOAV

Tracking No:

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.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

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

OGCC Operator Number: <u>10084</u>	Contact Name and Telephone: <u>LaCretia White</u>
Name of Operator: <u>Pioneer Natural Resources USA, Inc.</u>	No: <u>972-969-3738</u>
Address: <u>5205 N. O'Connor Blvd., Ste 200</u>	Fax: <u>972-969-3559</u>
City: <u>Irving</u> State: <u>TX</u> Zip: <u>75039</u>	
API Number: <u>05-071-09628</u> County: <u>Las Animas</u>	
Facility Name: <u>E Budd 24-33</u> Facility Number: <u>338403</u>	
Well Name: <u>E Budd</u> Well Number: <u>24-33</u>	37.296082, -104.681718
Location: (QtrQtr, Sec, Twp, Rng, Meridian): <u>SESW 33 31S 65W</u>	Latitude: 37.29611 Longitude: 104.6816

TECHNICAL CONDITIONS

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

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.): Non-crop Land

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Gulnare-Allens Park comple

Potential receptors (water wells within 1/4 mi, surface waters, etc.): nearest water well - 3204.8 (if DWR point is accurate)
nearest surface water - 798.8' (if live water present)

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>soil within pit</u>	<u>soil sampling</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):

Produced water from this well was being stored in this onsite pit. The well is no longer going to the pit.

Describe how source is to be removed:

Produced water is not being sent to this pit and it is no longer needed.

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.:

Produced water may be surface discharged under a CDPS permit, disposed of in a Class II UIC injection well, or utilized for dust supression.



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.):

It is not expected that produced water stored in this lined pit communicated with nor affected groundwater.

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.

Pit liner has been removed for soil sampling and properly disposed of. If back berm of pit exists, this material will be utilized to backfill pit. Native fill material may be collected from the recontouring of cut and fill slopes. Fill material will be brought onsite, if needed, to adequately backfill pit. The top 3 feet of the pit will be filled with at least 25% native soil. If topsoil exists, this material will be overlain on the fill material. Backfilled material may be contoured in a manner to be utilized as a stormwater BMP.

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:

No impact to the surrounding environment occurred from the use of this lined pit.

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

Produced water may be surface discharged under a CDPS permit, disposed of in a Class II UIC injection well, or utilized for dust suppression.

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: 3/23/16 Date Site Investigation Completed: 3/23/16 Date Remediation Plan Submitted: 7/22/16
Remediation Start Date: upon approval Anticipated Completion Date: 3rd quarter 2016 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: LaCretia White

Signed: LaCretia White

Title: Staff Environmental Specialist

Date: 7/22/16

OGCC Approved: _____ Title: _____ Date: _____

CONDITIONS OF APPROVAL:

Notify COGCC when pit closure process is completed.

METALS

Analytical results demonstrate that background concentrations of arsenic (As) exceed Table 910-1 concentration levels. Analytical results demonstrate that concentrations of As in soils in the pit also exceed Table 910-1 concentration levels and the pit concentrations are less than or within analytical uncertainty of being equal to the background concentrations. The analytical results are summarized below:

METAL	BACKGROUND CONCENTRATION (MG/KG)	PIT CONTENTS, SOIL/BEDROCK BELOW PIT OR IMPACTED MEDIA (MG/KG)	TABLE 910-1 CONCENTRATION LEVELS (MG/KG)
Arsenic	1.1-2.3	0.98-1.2	0.39

COGCC and CDPHE have consulted and agree that operators do not need to request variances from CDPHE for instances where the concentrations of metals in impacted soils are equal to or less than background concentrations, but do not meet Table 910-1 concentration values. Operators must ensure that remaining pit contents are covered with a minimum of 3 feet of backfill and soil. The soil horizons must be replaced in their original relative position, and reclaimed in accordance with 1000 Series Rules.

Table 910-1		PIONEER NATURAL RESOURCES						
CONCENTRATION LEVELS								
Contaminant of Concern	Concentrations	Units	E BUDD 24-33 TOP OF PIT SS	E BUDD 24-33 BOTTOM OF PIT SS	E BUDD 24-33 NATIVE NORTH SS	E BUDD 24-33 NATIVE EAST SS	E BUDD 24-33 NATIVE SOUTH SS	E BUDD 24-33 NATIVE WEST SS
Organic Compounds in Soil								
TPH (Gasoline Range Organics)		mg/kg		ND				
TPH (Diesel Range Organics)		mg/kg		5.2				
Benzene	0.17	mg/kg		ND				
Toluene	85	mg/kg		ND				
Ethylbenzene	100	mg/kg		ND				
Xylenes (total)	175	mg/kg		ND				
Acenaphthene	1000	mg/kg						
Anthracene	1000	mg/kg						
Benzo(A)anthracene	0.22	mg/kg						
Benzo(B)fluoranthene	0.22	mg/kg						
Benzo(K)fluoranthene	2.2	mg/kg						
Benzo(A)pyrene	0.022	mg/kg						
Chrysene	22	mg/kg						
Dibenzo(A,H)anthracene	0.022	mg/kg						
Fluoranthene	1000	mg/kg						
Fluorene	1000	mg/kg						
Indeno(1,2,3,C,D)pyrene	0.22	mg/kg						
Napthalene	23	mg/kg						
Pyrene	1000	mg/kg						
Organic Compounds in Ground Water								
Benzene	5	µg/l						
Toluene	560 to 1000	µg/l						
Ethylbenzene	700	µg/l						
Xylenes (total)	1400 to 10,000	µg/l						
Inorganics in Soils								
Electrical Conductivity (EC)	<4000 or 2x background	umhos/cm	310	320				
Sodium Adsorption Ratio (SAR)	<12	NA	3.1	3.2				
pH	6.0-9.0	NA	7.98	7.89				
Inorganics in Ground Water								
Total Dissolved Solids (TDS)	<1.25 x background	NA						
Chlorides	<1.25 x background	NA						
Sulfates	<1.25 x background	NA						
Metals in Soils								
Arsenic	0.39	mg/kg	0.98	1.2	1.4	1.1	1.7	2.3
Barium Total	15,000	mg/kg		190				
Boron	NA	mg/kg		ND				
Boron (Hot Water Soluble)	2	mg/L		NT				
Cadmium	70	mg/kg		ND				
Chromium (III)	120,000	mg/kg		NA				
Chromium (VI)	23	mg/kg		NT				
Copper	3,100	mg/kg		19				
Lead	400	mg/kg		9.9				
Mercury	23	mg/kg		0.024				
Nickel	1,600	mg/kg		15				
Selenium	390	mg/kg		ND				
Silver	390	mg/kg		ND				
Zinc	23,000	mg/kg		54				
Chromium		mg/kg		19				
Liquid Hydrocarbons in Soils and Ground Water								
Liquid hydrocarbons including condensate and oil	Below detection level	NA		NA				

NA - not applicable

NT - not tested

ND - below the method detection limit

Cr - if Total Cr is >23 mg/kg, an analysis is completed for Cr VI, to facilitate calculation of Cr III

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
 Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 TOP OF PIT SS

Lab Sample ID: 280-81176-1

Date Collected: 03/23/16 13:10

Matrix: Solid

Date Received: 03/25/16 09:45

Method: 20B - Sodium Adsorption Ratio - Soluble

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Sodium Adsorption Ratio	3.1		1.2		No Unit		03/29/16 18:58	04/04/16 17:57	10
Sodium	79		10		mg/Kg		03/29/16 18:58	04/04/16 17:57	10
Calcium	36		2.0		mg/Kg		03/29/16 18:58	04/04/16 17:57	10
Magnesium	8.5		2.0		mg/Kg		03/29/16 18:58	04/04/16 17:57	10

General Chemistry

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	7.6		0.1		%			03/29/16 18:59	1

General Chemistry - Soluble

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
pH	7.98		0.100		SU		03/29/16 11:54	04/05/16 12:22	1
Specific Conductance (25C)	310		10		umhos/cm		03/29/16 11:54	04/02/16 12:33	1

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 TOP OF PIT SS

Lab Sample ID: 280-81176-1

Date Collected: 03/23/16 13:10

Matrix: Solid

Date Received: 03/25/16 09:45

Percent Solids: 92.4

Method: 6020 - Total Metals by ICP-MS

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	0.98		0.11		mg/Kg	☒	03/28/16 11:52	03/30/16 17:52	1

- 1
- 2
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- 10
- 11

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 BOTTOM OF PIT SS

Lab Sample ID: 280-81176-2

Date Collected: 03/23/16 13:12

Matrix: Solid

Date Received: 03/25/16 09:45

Percent Solids: 90.0

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		0.0047		mg/Kg	☼	03/28/16 17:00	03/28/16 23:07	1
Ethylbenzene	ND		0.0047		mg/Kg	☼	03/28/16 17:00	03/28/16 23:07	1
Toluene	ND		0.0047		mg/Kg	☼	03/28/16 17:00	03/28/16 23:07	1
Xylenes, Total	ND		0.0047		mg/Kg	☼	03/28/16 17:00	03/28/16 23:07	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	101		58 - 140	03/28/16 17:00	03/28/16 23:07	1
Toluene-d8 (Surr)	104		80 - 126	03/28/16 17:00	03/28/16 23:07	1
4-Bromofluorobenzene (Surr)	104		76 - 127	03/28/16 17:00	03/28/16 23:07	1
Dibromofluoromethane (Surr)	103		75 - 121	03/28/16 17:00	03/28/16 23:07	1

Method: 8015B - Gasoline Range Organics - (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO) -C6-C10	ND		1.3		mg/Kg	☼	03/29/16 11:02	03/30/16 01:07	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
a,a,a-Trifluorotoluene	95		77 - 123	03/29/16 11:02	03/30/16 01:07	1

Method: 8015B - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Diesel Range Organics [C10-C28]	5.2		4.4		mg/Kg	☼	03/29/16 18:03	03/31/16 13:51	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
o-Terphenyl	92		49 - 115	03/29/16 18:03	03/31/16 13:51	1

Method: 20B - Sodium Adsorption Ratio - Soluble

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Sodium Adsorption Ratio	3.2		1.2		No Unit		03/29/16 18:58	04/04/16 18:00	10

Method: 6010B - Total Metals

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Barium	190		0.92		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1
Boron	ND		9.2		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1
Cadmium	ND		0.46		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1
Calcium	4700		46		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1
Magnesium	3500		18		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1
Molybdenum	ND		1.8		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1
Silver	ND		0.92		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1
Sodium	ND		460		mg/Kg	☼	03/29/16 14:45	03/31/16 14:41	1

Method: 6020 - Total Metals by ICP-MS

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	1.2		0.094		mg/Kg	☼	03/28/16 11:52	03/31/16 16:43	1
Chromium	19	F1	0.19		mg/Kg	☼	03/28/16 11:52	03/31/16 16:43	1
Copper	19	F1	0.24		mg/Kg	☼	03/28/16 11:52	03/31/16 16:43	1
Lead	9.9		0.094		mg/Kg	☼	03/28/16 11:52	03/31/16 16:43	1
Nickel	15	F1	0.14		mg/Kg	☼	03/28/16 11:52	03/31/16 16:43	1
Selenium	ND		0.19		mg/Kg	☼	03/28/16 11:52	03/31/16 16:43	1
Zinc	54	F1	0.94		mg/Kg	☼	03/28/16 11:52	03/31/16 16:43	1

TestAmerica Denver

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
 Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 BOTTOM OF PIT SS

Lab Sample ID: 280-81176-2

Date Collected: 03/23/16 13:12

Matrix: Solid

Date Received: 03/25/16 09:45

Percent Solids: 90.0

Method: 7471A - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.024		0.020		mg/Kg	☼	03/30/16 11:40	03/30/16 14:41	1

General Chemistry

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	10.0		0.1		%			03/29/16 18:59	1

General Chemistry - Soluble

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
pH	7.89		0.100		SU		03/29/16 11:54	04/05/16 12:22	1
Specific Conductance (25C)	320		10		umhos/cm		03/29/16 11:54	04/02/16 12:33	1



Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE NORTH SS

Lab Sample ID: 280-81176-3

Date Collected: 03/23/16 13:14

Matrix: Solid

Date Received: 03/25/16 09:45

General Chemistry

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	24.2		0.1		%			03/29/16 18:59	1

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE NORTH SS

Lab Sample ID: 280-81176-3

Date Collected: 03/23/16 13:14

Matrix: Solid

Date Received: 03/25/16 09:45

Percent Solids: 75.8

Method: 6020 - Total Metals by ICP-MS

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	1.4		0.10		mg/Kg	☒	03/28/16 11:52	03/30/16 18:21	1

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE EAST SS

Lab Sample ID: 280-81176-4

Date Collected: 03/23/16 13:16

Matrix: Solid

Date Received: 03/25/16 09:45

General Chemistry

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	18.9		0.1		%			03/29/16 18:59	1

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE EAST SS

Lab Sample ID: 280-81176-4

Date Collected: 03/23/16 13:16

Matrix: Solid

Date Received: 03/25/16 09:45

Percent Solids: 81.1

Method: 6020 - Total Metals by ICP-MS

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	1.1		0.089		mg/Kg	☒	03/28/16 11:52	03/30/16 18:25	1

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Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE SOUTH SS

Lab Sample ID: 280-81176-5

Date Collected: 03/23/16 13:18

Matrix: Solid

Date Received: 03/25/16 09:45

General Chemistry

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	4.7		0.1		%			03/29/16 18:59	1

Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE SOUTH SS

Lab Sample ID: 280-81176-5

Date Collected: 03/23/16 13:18

Matrix: Solid

Date Received: 03/25/16 09:45

Percent Solids: 95.3

Method: 6020 - Total Metals by ICP-MS

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	1.7		0.080		mg/Kg	☒	03/28/16 11:52	03/30/16 18:28	1

- 1
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Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE WEST SS

Lab Sample ID: 280-81176-6

Date Collected: 03/23/16 13:19

Matrix: Solid

Date Received: 03/25/16 09:45

General Chemistry

Analyte	Result	Qualifier	RL	RL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Moisture	29.3		0.1		%			03/29/16 18:59	1

- 1
- 2
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Client Sample Results

Client: Pioneer Natural Resources USA, Inc.
Project/Site: Soil Testing Suite

TestAmerica Job ID: 280-81176-1

Client Sample ID: E BUDD 24-33 NATIVE WEST SS

Lab Sample ID: 280-81176-6

Date Collected: 03/23/16 13:19

Matrix: Solid

Date Received: 03/25/16 09:45

Percent Solids: 70.7

Method: 6020 - Total Metals by ICP-MS

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	2.3		0.13		mg/Kg	☒	03/28/16 11:52	03/30/16 18:32	1

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- 11