

State of Colorado Oil and Gas Conservation Commission

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Document Number:

401204915

Receive Date:

05/16/2017

Report taken by:

CARLOS LUJAN

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: LINN OPERATING LLC	Operator No: 10516	Phone Numbers Phone: (970) 2855207 Mobile: (970) 9482785
Address: 600 TRAVIS STREET #1400		
City: HOUSTON State: TX Zip: 77002		
Contact Person: Tom Hogelin	Email: tgh@bry.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10237

Initial Form 27 Document #: 401204915

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 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 checked="" type="checkbox"/> Other Update landfarming plan for drill cuttings. |

SITE INFORMATION

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

Facility Type: LAND APPLICATION SITE	Facility ID: 443348	API #:	County Name: GARFIELD
Facility Name: School Point OM K15 696	Latitude: 39.522042	Longitude: -108.097031	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NESW	Sec: 15	Twp: 6S	Range: 96W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications ML

Most Sensitive Adjacent Land Use Grazing

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

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
No	SOILS	Confined to bermed treatment area	Visual inspection

INITIAL ACTION SUMMARY

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

Drill cuttings were blended with clean soil and stockpiled on location. Samples of these spoils have been taken annually (except 2013) beginning in 2012. Composite samples reported that TPH never exceeded COGCC Table 910-1, however, every sample reported that benzo(a)pyrene has exceeded the standards.

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):

Samples will be taken semi-annually (twice a year) in the summer and fall.

- Phase I - Composite sample will be taken from 8 locations on the spoil pile in early summer and analyzed.

- o If composite sample passes, discrete samples will be taken to confirm the composite samples.

- o If discrete samples pass, spoil will be buried per COGCC rules and interim reclamation of the pad will take place.

- o If discrete samples fail, landfarming will continue.

- o If composite sample fails, landfarming will continue.

- Phase II - Composite sample will be taken from 8 locations on the spoil pile in late fall and analyzed.

- o Procedure will be the same as Phase I

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 14

Number of soil samples exceeding 910-1 8

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 11250

NA / ND

-- Highest concentration of TPH (mg/kg) 739.1

-- Highest concentration of SAR 23

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 2

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)

Volume of liquid waste (barrels)

☐ Is further site investigation required?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

o Approximately 12,794 cubic yards of spoil material that is being treated on site by land farming is remnants from drilling and completion operations. The landfarming operations have taken place since the summer of 2011. Samples taken since September 26, 2012 indicate that this material fails COGCC Table 910-1 for benzo(a)pyrene at various levels (0.0639 – 0.10). The highest reading was taken on Oct. 8, 2016. The spoil material was spread out Sept. 12, 2016 and was treated three times in 2016: (May 25, July 28, & Sept. 15). TPH levels did not exceed the COGCC Table 910-1 standards at any time on this location.

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.

o At the current time, this location has been tilled three times. Analysis of the pre-treatment samples recommended increasing the ammonia-phosphorus fertilizer at a slightly higher rate than previous rate and adding fulvic acid. A copy of the pre-treatment lab report is attached to the Form 27. The landfarm spoils piles have been spread out even more on the site, but to achieve optimum exposure to sunlight and air, approximately 6,500 cubic yards will be moved to the L15 696 pad and spread out to approximately 12" – 16" high. The remaining 6,294 cubic yards will be spread out on the K15 696 pad to approximately 12" – 16" depth. A diagram of the L15 696 pad is attached to the Form 27.

Soil Remediation Summary

☐ In Situ

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

☒ Ex Situ

Yes _____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 260
Name of Licensed Disposal Facility or COGCC Facility ID # _____
Yes _____ Excavate and onsite remediation
Yes _____ Land Treatment
No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
No _____ Natural Attenuation
No _____ 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

Frequency: ☐ Quarterly ☒ Semi-Annually ☐ Annually ☐ Other _____

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? 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 260

E&P waste (solid) description pit bottom solids

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Garfield County West Rifle Landfill

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

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.

Pit will be backfilled with treated spoils, pit excess spoils, and pad excess spoils. Pad slopes will be reclaimed not to exceed 3:1 slope. Horizontal ripping, stair-stepping, grooving, tracking, or pocketing on slopes will be utilized to reduce erosion. Surface roughening shall be utilized on all areas receiving revegetation. Topsoil will be spread over all areas to be revegetated. These areas are identified on the attached drawing. Seed applied by drill will be covered by weed-free straw, mulched and crimped. Seed applied by hydroseeding will be tackified. A copy of the seed mix is attached. Monthly inspections for physical signs of compaction alleviation will be conducted by a qualified inspector while conducting stormwater inspections except when the location is in winter exclusion status. The location will be inspected during the growing season by a qualified contractor capable of identifying noxious weeds and selecting and applying the appropriate chemical to eradicate those noxious weeds.

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 approve the seed mix? Yes

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. 08/09/2012

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/17/2012

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 09/17/2012

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Attachments: reclamation plan; seed mix; pre-treatment lab report; Dave Nicholson recommendations; site drawing of landfarmed materials on L15 696 pad. Land owner, Encana Oil & Gas has approved of the movement of these landfarmed materials from the K15 696 pad to the L15 696 pad.

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

Signed: Tom Hogelin

Title: Construction Foreman

Submit Date: 05/16/2017

Email: tgh@bry.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: CARLOS LUJAN

Date: 06/30/2017

Remediation Project Number: 10237

COA Type**Description**

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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.

Att Doc Num**Name**

401204915	FORM 27-INITIAL-SUBMITTED
401204959	RECLAMATION PLAN
401204960	RECLAMATION PLAN
401284531	REMEDIAL ACTION PLAN
401284533	REMEDIAL ACTION PLAN
401284534	REMEDIAL ACTION PLAN
401284541	REMEDIAL ACTION PLAN

Total Attach: 7 Files

General Comments**User Group****Comment****Comment Date**

Environmental	The Form 27 is conditionally approved; however, additional information or activities may be required during the course of remediation. Conditions of Approval (COAs) will be forthcoming on Supplemental Form 27s.	06/30/2017
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Total: 1 comment(s)