

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
401208298

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10239 Initial Form 27 Document #: 401208298

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 <u>Update landfarming plan for drill cuttings.</u> |

SITE INFORMATION

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

Facility Type: <u>LAND APPLICATION SITE</u>	Facility ID: <u>443349</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>Granlee OM B10 696</u>	Latitude: <u>39.542250</u>	Longitude: <u>-108.090697</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>10</u>	Twp: <u>6S</u>	Range: <u>96W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

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:

- | | | |
|--|--|--|
| <input type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input 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 checked="" type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> 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.

Approximately 414 cubic yards of spoil material that is being treated on site by land farming is from the bottom of the pit after the liner was removed. This material fails COGCC Table 910-1 for benzo(a)pyrene. Landfarming began in the summer of 2016. The latest sample taken on Oct. 8, 2016 was 0.0626. This material was spread out and treated three times in 2016 (May 24, July 25, & Sept. 13).

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.
- 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 9

Number of soil samples exceeding 910-1 4

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) 10700

-- Highest concentration of SAR 50

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.

Spoil will be turned over by an excavator or by a Kubota farm tractor with a chisel point plow 10 to 12 times (depending on weather and snow conditions) during the warm months in 2017. The soil will be turned over with the frequency established in the plan as a minimum or with a higher frequency if possible.

REMEDICATION 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 In 2017, the landfarmed material has been spread out to a depth of 6"-12" and has been tilled two times with an excavator. Amendments added to each treatment are phosphorus and fulvic acid. Tilling with either an excvator or a Kubota farm tractor with a chisel point plow and adding amendments will continue once every 10 to 14 days until composite samples meet 910-1 standards.
o Composite samples were taken on May 6, 2017. Lab results are pending at the time of this report.

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) _____ 95
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 _____ 95

E&P waste (solid) description pit bottom solids

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: OWL Western Gravel - Piceance

Volume of E&P Waste (liquid) in barrels _____ 1091

E&P waste (liquid) description sludge

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: RN Industries - Piceance

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.

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. 08/02/2012

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/13/2012

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 09/26/2012

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

Attachments: updated 2017 landfarming plan; reclamation plan, seed mixture; lab report for nutrients; & Dave Nicholson recommendation for treatment.

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: thogelin@linnenergy.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: 10239 _____

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**

401208298	FORM 27-INITIAL-SUBMITTED
401208547	RECLAMATION PLAN
401213160	RECLAMATION PLAN
401213161	RECLAMATION PLAN
401284479	REMEDIAL ACTION PLAN
401284482	REMEDIAL ACTION PLAN
401284487	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)