

State of Colorado Oil and Gas Conservation Commission

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401349754

Receive Date:

07/21/2017

Report taken by:

CHRIS CANFIELD

Site Investigation and Remediation Workplan (Supplemental 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: CARRIZO NIOBRARA LLC	Operator No: 10439	Phone Numbers Phone: (713) 3586227 Mobile: (281) 7702735
Address: 500 DALLAS STREET #2300		
City: HOUSTON	State: TX Zip: 77002	
Contact Person: Eric Johansson	Email: eric.johansson@carrizo.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 9711 Initial Form 27 Document #: 2526436

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: PIT	Facility ID: 114107	API #: _____	County Name: ADAMS
Facility Name: CUSTY 1		Latitude: 39.872691	Longitude: -104.769567
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: SWSW	Sec: 15	Twp: 2S	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use RESIDENTIAL

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

DWR WELL PERMIT #105682, KENNETH J CUSTY, DOMESTIC WELL, ~425' NW, WELL IS PERFORATED 220 TO 360' BEL

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) Impacted soil & groundwater

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
	GROUNDWATER	SEE ATTACHED	LABORATORY RESULTS
	SOILS	SEE ATTACHED	VISUAL OBSERVATIONS & LAB RESULTS

INITIAL ACTION SUMMARY

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

Facility was shut-in, documented on Form 19 submitted on 6/17/16. The portion of the dump line that contained a small hole was identified, removed and capped.

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):

Soil samples will be collected and sent to lab for analysis. It is unknown at this time the number of samples to be collected but will be identified in full report post excavation.

Proposed Groundwater Sampling

☒ Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Water samples will possibly be collected and sent to lab for analysis. It is unknown at this time the number of samples to be collected but will be identified in full report post excavation.

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? _____

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) _____

Volume of liquid waste (barrels) _____

☒ Is further site investigation required?

Soil boring/monitoring well installation activities are scheduled to be completed on 6/27/16. Once laboratory analytical results are obtained, a site map will be constructed illustrating sample locations. If remediation is necessary, a site map illustrating remediation activities will also be included in a supplemental Form 27 submitted to the COGCC.
Update 7/21/17: See description in remedial action plan section

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Source removal excavation activities were completed at the site from 6/17/16 through 6/22/16. In addition, vac trucks were used to remove any impacted groundwater that accumulated within the base of the excavation.

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.

Update: 7/21/2017 - The following request and proposal to remediate are as follows:

Carrizo requests the approval to discontinue the quarterly monitoring of MW 10, 11 & 12 wells due to 4 consecutive quarters of compliance with COGCC guidelines. Documentation is attached with lab results and site maps/diagrams.

Carrizo requests with COGCC approval to proceed with excavation of impacted soils in the general area of the tank battery (previous storage tanks) with disposal of impacted soils at approved offsite facility. Upon completion of excavation and laboratory confirmation impacted soils have been successfully removed, carbon amendment will be added to the excavated area for further remediation. Any affected water monitoring wells that may temporarily have to be removed will be reinstalled. Carrizo expects during excavation efforts to potentially encounter groundwater during operations. Any groundwater in volumes that can be collected via vacuum truck will be disposed of at approved disposal facility. Monitoring of the water wells will continue upon completion of excavation and backfill.

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) _____ 100

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

No _____ Excavate and onsite remediation

_____ Land Treatment

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)

☐ _____ Chemical oxidation

☐ _____ Air sparge / Soil vapor extraction

☐ _____ Natural Attenuation

Yes _____ Other Apply carbon enhancement to excavated area to help in remediation of impacted soils & groundwater

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.

Seven proposed monitoring wells (MW-01 through MW-07) are scheduled to be installed on 6/27/16 to define residual petroleum hydrocarbon impacts beneath the site. Additional monitoring wells may be installed based on field observations. Based on laboratory analytical results, if concentrations in groundwater exceed COGCC Table 910-1 regulatory limits, groundwater samples will be collected from the monitoring wells on a quarterly schedule. Groundwater will be analyzed for BTEX following EPA Method 8260. The monitoring plan may be amended based on groundwater analytical results indicating COGCC Table 910-1 compliance in surrounding monitoring wells.

Update 7/21/17: total of 14 monitoring wells were installed in 2016. All wells have had 4 consecutive quarters of sampling.

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? _____

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: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No _____

Do all soils meet Table 910-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? _____

Does Groundwater meet Table 910-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

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.

The excavation was backfilled with clean fill to grade. The environmental footprint will be assessed following plug and abandonment activities and remediation activities and will be detailed in a separate report.

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. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). _____

Date of commencement of Site Investigation. 06/17/2016

Date of completion of Site Investigation. 06/27/2016

REMEDIAL ACTION DATES

Date of commencement of Remediation. 06/17/2016

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

See remedial action plan section for full description of project progress/proposal.

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

Signed: Eric Johansson

Title: EHS Supervisor

Submit Date: 07/21/2017

Email: eric.johansson@carrizo.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: CHRIS CANFIELD

Date: 07/28/2017

Remediation Project Number: 9711

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

401349754	INVESTIGATION/REMEDIALATION WORKPLAN (SUPPLEMENTAL)
401349910	MAP
401349922	ANALYTICAL RESULTS
401357572	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)