

State of Colorado Oil and Gas Conservation Commission

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401559817

Receive Date:

03/23/2018

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
Address: 500 DALLAS STREET #2300		Phone: (713) 358-6227
City: HOUSTON State: TX Zip: 77002		Mobile: (281) 770-2735
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
Yes	GROUNDWATER	~50 x 60'	LABORATORY RESULTS
Yes	SOILS	unknown	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 possibly be collected and sent to lab for analysis if impacted soil is encountered.

Proposed Groundwater Sampling

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

Water samples from MW-1R and MW-13R will be collected during future groundwater sampling events.

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 37

Number of soil samples exceeding 910-1 10

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

Approximate areal extent (square feet) 20

NA / ND

-- Highest concentration of TPH (mg/kg) 4320

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 7

Groundwater

Number of groundwater samples collected 96

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 10'

Number of groundwater monitoring wells installed 14

Number of groundwater samples exceeding 910-1 23

-- Highest concentration of Benzene (µg/l) 3800

-- Highest concentration of Toluene (µg/l) 5400

-- Highest concentration of Ethylbenzene (µg/l) 210

-- Highest concentration of Xylene (µg/l) 5000

NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 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) 1338

Volume of liquid waste (barrels) 15

☐ Is further site investigation required?

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 and 8/15/17 through 8/18/17.

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.

Any residual soil impacts and groundwater impacts will be addressed via excavation followed by groundwater amendment application (granular carbon and gypsum). The areas around MW-1 and MW-13 will be excavated to approximately 15 feet bgs for application of groundwater amendment. If any soil impacts are encountered during excavation activities they will be removed and disposed of offsite at Republic Tower Landfill. If monitoring wells MW-1 or MW-13 are damaged in the excavation process they will be replaced for continued quarterly groundwater sampling. Following the application of groundwater amendment, each excavation will be backfilled to grade with clean fill. Excavation areas are presented in an attached map.

Soil Remediation Summary

☒ In Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

Yes Other Apply groundwater amendment to excavated area to help in remediation of impacted groundwater. _____

☒ Ex Situ

Yes Excavate and offsite disposal

_____ If Yes: Estimated Volume (Cubic Yards) 10

_____ 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 groundwater amendment to excavated area to help in remediation of impacted 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.

Complete quarterly groundwater monitoring at eleven groundwater monitoring wells (MW-01 through MW-05, MW-6R, MW-7R, MW-08, MW-09, MW-13, and MW-14. If monitoring well MW-1 or MW-13 get damaged in the excavation groundwater amendment applicatoin activiites they will be replaced and included in the sampling plan. 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.

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

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

Signed: Eric Johansson

Title: EH&S Supervisor

Submit Date: 03/23/2018

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: 03/27/2018

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

401559817	FORM 27-SUPPLEMENTAL-SUBMITTED
401581754	SITE MAP
401584495	GROUND WATER SAMPLE LOCATION

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)