

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:
401594986
Receive Date:
04/03/2018

Report taken by:
CARLOS LUJAN

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 INFORMATON

Name of Operator: CPX PICEANCE HOLDINGS LLC	Operator No: 10639	Phone Numbers
Address: 34 S WYNDEN DR STE 240		Phone: (713) 554-9031
City: HOUSTON State: TX Zip: 77056		Mobile: (720) 233-8275
Contact Person: Nicolas Kurtenbach	Email: nick@cpxpiceance.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 10807 Initial Form 27 Document #: 401488231

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 checked="" 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 type="checkbox"/> Other _____

SITE INFORMATION N Multiple Facilites (in accordance with Rule 909.c.)

Facility Type: PIT	Facility ID: 416339	API #: _____	County Name: GARFIELD
Facility Name: TEPEE PARK CFF	Latitude: 39.396090	Longitude: -107.833500	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 36	Twp: 7S	Range: 94W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Beaver Creek is approximately 260 feet SW.

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

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

Pit materials not in contact with produced water.

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
UNDETERMINED	SOILS	Undetermined	To be determined

INITIAL ACTION SUMMARY

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

Materials in contact with E&P waste will be disposed of as E&P waste.

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):

Five discrete soil samples will be collected from the soil immediately beneath the low points of the pit. Soil samples will be analyzed for compounds listed in COGCC Table 910-1. Please see attached diagram for the soil sample locations.

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):

Pit water will be sampled and analyzed for COGCC Table 910-1 compounds. This is to determine and document the water quality for beneficial re-use or disposal. A proposed sampling location diagram is attached.

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) 25
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

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.

The pit is to be demolished. The pit liner and other materials in contact with the contents (produced water) will be disposed of as E&P waste. Other materials will be disposed of as solid waste. All waste will be disposed at an approved landfill.

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.

Soil beneath the pit will be sampled as described in the site investigation plan. Impacted soil, if any, will be removed and disposed of at an approved landfill.

Soil Remediation Summary

In Situ

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

Ex Situ

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or COGCC Facility ID # _____
- _____ Excavate and onsite remediation
- _____ Land Treatment
- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Other _____

Groundwater Remediation Summary

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

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other After the demolition and removal of the pit.

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other Pit closure report

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 200

E&P waste (solid) description Spent pit materials.

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Greenleaf

Volume of E&P Waste (liquid) in barrels 10000

E&P waste (liquid) description Produced water

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Greenleaf

REMEDIATION COMPLETION REPORT

REMEDIATION 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 compacted soil beneath the pit will be left in place if not impacted. The material will be ripped, mixed with native soil in a manner to alleviate compaction, and seeded.

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? Yes

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 12/15/2017

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/21/2018

Date of commencement of Site Investigation. 10/01/2018

Date of completion of Site Investigation. 11/05/2018

REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/22/2018

Date of completion of Remediation. 11/19/2018

SITE RECLAMATION DATES

Date of commencement of Reclamation. 11/19/2018

Date of completion of Reclamation. 10/30/2020

OPERATOR COMMENT

Timing for the pit removal has been modified due to pending access road and pipeline construction. Please see the attached letter, further detailing the schedule. Please see the attached engineering drawings which include leak detection, and the US Forest Service Record of Decision (ROD) dated Nov. 3, 2017.

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

Signed: Mary C. Griggs

Title: Regulatory Consultant

Submit Date: 04/03/2018

Email: griggs.mary@comcast.net

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: 06/05/2018

Remediation Project Number: 10807

COA Type

Description

	<p>It is stated that:</p> <p>Five discrete soil samples will be collected from the soil immediately beneath the low points of the pit. Soil samples will be analyzed for compounds listed in COGCC Table 910-1. Please see attached diagram for the soil sample locations.</p> <p>NOTE: There are no diagrams attached.</p> <p>The Operator shall collect enough DISCRETE soil samples to adequately characterize the areas beneath liner to determine whether an impact may have occurred. Samples shall be analyzed for Table 910-1 constituents.</p>
	<p>The Operator proposes:</p> <p>If Table 910-1 results are favorable, we may seek permission to beneficially use the water from the pit for construction dust control, mainly on the roads.</p> <p>The Operator shall prepare and submit a 907.a.(3) waste management plan, at a minimum, detailing specific of sampling the fluids, details in the application of the fluids, surface owner approval of where fluids would be applied, sensitive area determination along the entire route of where the fluids would be applied, identification of all surface water features along the entire route and within 0.5 mile of where fluids would be applied, source of fluids remaining in the Pit Facility, etc.</p>

	<p>It is stated that: Pit water will be sampled and analyzed for COGCC Table 910-1 compounds. This is to determine and document the water quality for beneficial re-use or disposal. A proposed sampling location diagram is attached.</p> <p>NOTE: There are no diagrams attached.</p> <p>Document Number 401509519 attached to Supplemental F27 (Document Number 401509519) illustrates that 6 composite water samples will be collected from the pit and analyzed for Table 910-1 constituents.</p> <p>Enough fluid samples shall be collected to adequately characterized contents of the pit and analyzed for Table 910-1 constituents.</p>
--	---

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.

<u>Att Doc Num</u>	<u>Name</u>
401594986	FORM 27-SUPPLEMENTAL-SUBMITTED
401595023	OTHER
401595688	CORRESPONDENCE
401595696	OTHER

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)