

# State of Colorado Oil and Gas Conservation Commission

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401752256

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Report taken by:

Steven Arauza

## 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: CAERUS PICEANCE LLC	Operator No: 10456	<b>Phone Numbers</b>
Address: 1001 17TH STREET #1600		
City: DENVER State: CO Zip: 80202		
Contact Person: Jake Janicek	Email: jjanicek@caerusoilandgas.com	
		Phone: (970) 285-9606
		Mobile: (970) 778-2314

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 11653

Initial Form 27 Document #: 401640503

#### 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 checked="" 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 Cuttings Remediation Closure                                     |

#### SITE INFORMATION

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

Facility Type: LOCATION	Facility ID: 416157	API #:	County Name: GARFIELD
Facility Name: Puckett 697-26A	Latitude: 39.498914	Longitude: -108.183089	
** correct Lat/Long if needed: Latitude: 39.498461		Longitude: -108.183146	
QtrQtr: NWNE	Sec: 26	Twp: 6S	Range: 97W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications OL

Most Sensitive Adjacent Land Use Rangeland

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

☐ 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
Yes	SOILS	320'x170'x2-3'	Laboratory Analytical

### INITIAL ACTION SUMMARY

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

Please refer to the narrative attached to this Form 27.

### 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 ):

#### 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 18

Number of soil samples exceeding 910-1 12

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

Approximate areal extent (square feet) 54400

### NA / ND

-- Highest concentration of TPH (mg/kg) 259

-- Highest concentration of SAR 19

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 0

### 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?

Background samples for arsenic were collected from an adjacent pad. Background analytical data is included as an attachment to this Form 27.

☐ 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.

Please refer to the narrative attached to this Form 27.

### **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.

Please refer to the narrative attached to this Form 27.

### **Soil Remediation Summary**

☐ In Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

☒ Ex Situ

No \_\_\_\_\_ Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

Yes \_\_\_\_\_ Excavate and onsite remediation

Yes \_\_\_\_\_ Land Treatment

Yes \_\_\_\_\_ 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

☐ 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? No

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? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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? Yes

Is additional groundwater monitoring to be conducted? No

## 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.

Cuttings will be utilized as beneficial reuse during the interim reclamation process. Cuttings will be positioned in the cut slope under three feet of clean material, segregated soil horizons replaced to their original relative positions, fill and cut slopes recontoured to achieve erosion control/long-term stability, and top soil tilled adequately to establish a proper seedbed. A seed mix approved by the landowner will be used to re-seed all disturbed non-working surface areas during the next favorable season. Bare ground and noxious weed spraying programs will be utilized for weed prevention.

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. \_\_\_\_\_

Actual Spill or Release date, if known. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/30/2018

Date of commencement of Site Investigation. 04/30/2018

Date of completion of Site Investigation. 08/06/2018

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 04/24/2018

Date of completion of Remediation. 07/25/2018

### SITE RECLAMATION DATES

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

### OPERATOR COMMENT

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

Signed: Jake Janicek \_\_\_\_\_

Title: EHS Professional \_\_\_\_\_

Submit Date: 09/10/2018 \_\_\_\_\_

Email: jjanicek@caerusoilandgas.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: Steven Arauza \_\_\_\_\_

Date: 10/09/2018 \_\_\_\_\_

Remediation Project Number: 11653 \_\_\_\_\_

### COA Type

### Description

	Operator shall submit Reclamation Plan via Form 4 Sundry Notice, per Rule 1003.e.(3), for review by COGCC Reclamation Specialist.
	Conditional approval of operator's request for closure for Remediation Project #11653 does not constitute approval for beneficial reuse of cuttings to reclaim well pad at this time.  Operator shall submit Beneficial Reuse plan via Form 4 Sundry, per Rule 907.a.3, for COGCC approval of beneficial reuse of land-treated cuttings.
	Operator shall conduct interim reclamation of 697-26A well pad (Location ID #416457) in accordance with COGCC 1000-Series reclamation requirements.  Note: Upon removal and beneficial reuse of cuttings, Land Treatment Unit Facility ID #456518 shall be subject to 1004-series final reclamation requirements.

### 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

401752256	FORM 27-SUPPLEMENTAL-SUBMITTED
401752381	OTHER
401752384	ANALYTICAL RESULTS
401752385	ANALYTICAL RESULTS
401752387	ANALYTICAL RESULTS

401752389	ANALYTICAL RESULTS
401752390	ANALYTICAL RESULTS
401757432	SOIL SAMPLE LOCATION MAP

Total Attach: 8 Files

### **General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Topographic maps indicate presence of pond located ~800'-1000' downhill of pad, inside of unnamed drainage that is tributary to Baker Gulch.	10/09/2018
Environmental	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if surface and/or ground water is found to be impacted, then further investigation and/or remediation activities will be required at the site.	10/09/2018
Environmental	Remediation Completion Report section indicates that "all soils meet Table 910-1 standards." Analytical results document Table 910-1 exceedances for EC and SAR for Cuts -E, -S, -N, -MID, -MID01, and MID-02, which are addressed by operator under Reclamation Planning section of eForm 27 and attached letter report.	10/09/2018
Environmental	COGCC Land Application Site Facility ID #456518 was created to document location of land treatment unit. Updated correct lat/long for this remediation project, based on location of land treatment cells.	10/09/2018

Total: 4 comment(s)