

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

401753940

Receive Date:

09/05/2018

Report taken by:

KRIS NEIDEL

## 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: <u>WESCO OPERATING INC</u>	Operator No: <u>95520</u>	<b>Phone Numbers</b> Phone: <u>(307) 577-5324</u> Mobile: <u>(307) 258-5878</u>
Address: <u>120 S DURBIN STREET</u>		
City: <u>CASPER</u>	State: <u>WY</u> Zip: <u>82602</u>	
Contact Person: <u>Gene VanDeest</u>	Email: <u>genev@kirkwoodcompanies.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 11554Initial Form 27 Document #: 401676452

#### 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 Facilities ( in accordance with Rule 909.c. )

Facility Type: <u>PIT</u>	Facility ID: <u>116704</u>	API #: _____	County Name: <u>MOFFAT</u>
Facility Name: <u>GOVERNMENT TRELEAVEN TB</u>		Latitude: <u>40.337308</u>	Longitude: <u>-108.091890</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSW</u>	Sec: <u>32</u>	Twp: <u>5N</u>	Range: <u>95W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SMMost Sensitive Adjacent Land Use WoodlandIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? NoIs 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"/> <b>E&amp;P Waste</b> | <input checked="" type="checkbox"/> <b>Other E&amp;P Waste</b>  | <input type="checkbox"/> <b>Non-E&amp;P Waste</b> |
| <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 type="checkbox"/> Pit Bottoms                            |   |
|   | <input checked="" type="checkbox"/> Other (as described by EPA) | Pit Soils _____                                   |

### DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Soils within the pit area	N/A

### INITIAL ACTION SUMMARY

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

N/A

### 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 ):

Wesco has taken samples at varying depths in two locations of the pit for sampling.

#### 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 5

Number of soil samples exceeding 910-1 5

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

Approximate areal extent (square feet) 5000

### NA / ND

NA Highest concentration of TPH (mg/kg)         

NA Highest concentration of SAR         

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 0

Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l)         

NA Highest concentration of Toluene (µg/l)         

NA Highest concentration of Ethylbenzene (µg/l)         

NA Highest concentration of Xylene (µg/l)         

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)         

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.

Wesco has taken samples at varying depths in two locations of the pit for sampling. Results show high levels of TEH, Benzo Fluoranthene, EC, SAR, Arsenic, and Boron from 0-2 feet in depth. Below the 2 foot depth the high levels of TEH, Benzo and Boron drop below 910-1 table concentration limits. Wesco Plans to remove the top 2 foot of contaminated soil and replace with clean material. Removed soil will be disposed of at an approved landfill facility.

### **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.

N/A

### **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) \_\_\_\_\_ 250

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**

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.

N/A

## 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? No \_\_\_\_\_

Do all soils meet Table 910-1 standards? No \_\_\_\_\_

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? Yes \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? \_\_\_\_\_

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.

Wesco Plans to remove the top 2 foot of contaminated soil and replace with clean material. Removed soil will be disposed of at an approved landfill facility. Enough material will be brought in to match surrounding topography and will be seeded when finished.

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? No \_\_\_\_\_

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). 07/16/2018

Date of commencement of Site Investigation. 08/15/2018

Date of completion of Site Investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Date of commencement of Remediation. \_\_\_\_\_

Date of completion of Remediation. \_\_\_\_\_

### SITE RECLAMATION DATES

Date of commencement of Reclamation. 09/06/2018

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

### OPERATOR COMMENT

Sample results show that removal of 2 feet of contaminated soil and hauled in clean soil will bring the pit under the 910-1 table concentrations. Wesco requests that once the 2 feet of soil removal has been completed that an amended sampling plan be done. Wesco requests no further BTEX, Metals (except Arsenic), or organic compound sampling in the amended sampling plan. See sample results for requested amended sampling plan.

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

Signed: Gene VanDeest

Title: HSE Coordinator

Submit Date: 09/05/2018

Email: genev@kirkwoodcompanies.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: KRIS NEIDEL

Date: 10/09/2018

Remediation Project Number: 11554

### COA Type

### Description

	Approval of this document acknowledges receipt of sample data. Approval of an amended sample schedule will be done with the background arsenic data is provided.
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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

401753940	FORM 27-SUPPLEMENTAL-SUBMITTED
401753989	ANALYTICAL RESULTS
401753990	ANALYTICAL RESULTS

Total Attach: 3 Files

## General Comments

### User Group

### Comment

### Comment Date

Environmental	It appears that DRO is the driving contaminate in this soil. There was one concentration of Benzo(b)fluoranthene of 0.39 mg/kg in the soil that was removed from the pit.	10/09/2018
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Total: 1 comment(s)