

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:

401799000

Receive Date:

10/16/2018

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: TOP OPERATING COMPANY	Operator No: 39560	Phone Numbers Phone: (720) 6631698 Mobile: (720) 6631698
Address: 3609 S WADSWORTH BLVD STE 340		
City: LAKEWOOD	State: CO Zip: 80235	
Contact Person: Paul Herring	Email: paul.herring@topoperating.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 11300 Initial Form 27 Document #: 401621714

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: LEASE	Facility ID: 10507	API #: _____	County Name: BOULDER
Facility Name: RIDER FAMILY TRUST #1		Latitude: _____	Longitude: _____
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 36	Twp: 3N	Range: 69W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Middle school and housing development

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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

☐ E&P Waste

☐ Other E&P Waste

☒ Non-E&P Waste

☒ Produced Water

☐ Workover Fluids

Unknown _____

☐ 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	GROUNDWATER	108' by 63'	N/A
Yes	SOILS	108' by 63' by 11'	laboratory analytical results
No	SURFACE WATER	N/A	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.

A soil boring assessment was conducted, per approved 27 (document # 401621714): 13 soil borings were advanced to a total depth of 15 feet adjacent to previously identified contamination based on Table 910 limits (document #2496197). Three soil borings had elevated TPH concentrations @7.5-10'. A grab groundwater sample was collected from previously installed MW-01R. The sample did not contain concentrations of BTEX above applicable Table 910 limits.

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):

25 soil samples were collected during soil boring assessment activities and submitted for laboratory analysis. All soil samples were analyzed for GRO, DRO, RRO, naphthalene, and BTEX following modified EPA methods 8260c and 8015, and pH, EC, SAR, following EPA Method 9045D, USDA Method 3, and USDA Method 20B.

Proposed Groundwater Sampling

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

A grab groundwater sample was collected from previously installed monitoring well MW-01R. The grab groundwater sample was submitted for BTEX analysis following EPA Method 8260c.

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 56

Number of soil samples exceeding 910-1 10

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

Approximate areal extent (square feet) 6804

NA / ND

-- Highest concentration of TPH (mg/kg) 2270

-- Highest concentration of SAR 4.07

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 10

Groundwater

Number of groundwater samples collected 7

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 9'

Number of groundwater monitoring wells installed 1

Number of groundwater samples exceeding 910-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

-- Highest concentration of Ethylbenzene (µg/l) 760

-- Highest concentration of Xylene (µg/l) 180

NA 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?

Elevated TPH concentrations above 910-1 regulatory limits were observed in a soil boring advanced adjacent to the previous Rider #1 facilities.

☒ Were background samples collected as part of this site investigation?

3 soil borings were advanced adjacent to the previous Rider #1 facilities as background comparison of soil concentrations

☐ 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.

Adsorbed soil impacts above COGCC Table 910-1 standards were removed via excavation from 8/13/18 through 8/28/18. Confirmation soil samples indicate impacted soil above COGCC Table 910-1 regulatory limits was removed. Impacted groundwater was removed via pump-truck prior to backfill.

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.

Source excavation activities were completed adjacent to petroleum hydrocarbon impacts identified during assessment activities on May 17, 2018. Confirmation soil samples (31) were collected during the excavation to confirm impacted soil above COGCC Table 910-1 was removed. 24 soil samples surround the edges of the excavation confirming the removal of impacted soil. Grab groundwater samples (5) were collected from the base of the excavation in lieu of saturated floor soil samples.

Soil samples were submitted for laboratory analysis of BTEX, naphthalene, GRO, and DRO following modified EPA Methods 8260c and 8015. The grab groundwater samples were submitted for BTEX analysis following EPA Method 8260c. Monitoring well MW-01R was destroyed during excavation activities. Soil and groundwater samples collected from replacement monitoring well MW-01R2 on October 2-3, 2018, were below COGCC Table 910-1 regulatory limits.

Additional groundwater sampling of monitoring well MW-01R2 will be completed for a minimum of 2 additional quarters to monitor BTEX concentrations on site. Based on laboratory analytical results, NFA can be requested if all samples are observed below applicable COGCC Table 910-1 regulatory limits.

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) _____ 0

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

☐ _____ Bioremediation (or enhanced bioremediation)

☐ _____ Chemical oxidation

☐ _____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

Yes _____ Other _____ Removal _____

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.

5 grab groundwater samples were collected during source removal activities. Impacted groundwater was removed via pump truck - confirmation grab groundwater sample EXC-GW-05 indicated groundwater BTEX concentrations were below COGCC Table 910-1. Additional groundwater samples will be collected from monitoring well MW-01R2 to monitor groundwater concentrations at the site. All groundwater samples were/will be analyzed for BTEX following EPA method 8260c.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Report Type: ☒ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Soil Remediation (Excavation) 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:

No beneficial use

Volume of E&P Waste (solid) in cubic yards 1700

E&P waste (solid) description Visually and laboratory confirmed impacted soil above COGCC Table 910-1 standards

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Tower Landfill - Commerce City, CO

Volume of E&P Waste (liquid) in barrels 1700

E&P waste (liquid) description impacted groundwater above 910-1 standards

COGCC Disposal Facility ID #, if applicable: 159485

Non-COGCC Disposal Facility: _____

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? 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? Yes _____

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.

Reclamation will be in accordance with COGCC 1000 series rules.

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? No _____

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 05/17/2018

Actual Spill or Release date, if known. 05/17/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/01/2018

Date of commencement of Site Investigation. 05/01/2018

Date of completion of Site Investigation. 05/17/2018

REMEDIAL ACTION DATES

Date of commencement of Remediation. 08/13/2018

Date of completion of Remediation. 08/28/2018

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: Paul Herring

Title: Landman

Submit Date: 10/16/2018

Email: paul.herring@topoperating.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: 12/18/2018

Remediation Project Number: 11300

COA Type

Description

--	--

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

401799000	FORM 27-SUPPLEMENTAL-SUBMITTED
401799047	ANALYTICAL RESULTS

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)