

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
401841711
Receive Date:
12/27/2018

Report taken by:
RICK ALLISON

Site Investigation and Remediation Workplan (Initial 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: <u>HIGHPOINT OPERATING CORPORATION</u>	Operator No: <u>10071</u>	Phone Numbers
Address: <u>1099 18TH ST STE 2300</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Rusty Frishmuth</u>	Email: <u>rfrishmuth@hpres.com</u>	
		Phone: <u>(303) 312-8718</u>
		Mobile: <u>(303) 518-2290</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 12261 Initial Form 27 Document #: 401841711

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 Facilites (in accordance with Rule 909.c.)

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>456514</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Production Tank Overflow</u>	Latitude: <u>40.916450</u>	Longitude: <u>-104.411525</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>15</u>	Twp: <u>11N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Agriculture
 Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No
 Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

None.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" 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 type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	570 square feet	Soil samples

INITIAL ACTION SUMMARY

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

Confirmation soil sampling was conducted following the release on 10/23/18. Four surficial (0-6") samples (SS01 through SS04) were collected throughout the release area for analysis of TPH as GRO and BTEX by USEPA Method 8260 and TPH as DRO by USEPA Method 8015. One sample was submitted for analysis of EC USEPA Method 120.1, pH by USEPA Method 6020, and SAR by calculation. Laboratory analytical results indicated soil samples SS02 and SS03 exceeded the COGCC Table 910-1 standard for TPH at concentrations of 530.67 mg/kg and 661.9 mg/kg, respectively. All other results were in compliance with applicable standards. Highpoint applied a biological soil amendment (Micro-Blaze) to accelerate attenuation of the affected area.

On 11/12/18, confirmation soil sampling was conducted at the locations SS02 and SS03 for analysis of BTEX and TPH as GRO/DRO. Laboratory analytical results indicated that sample SS02 was in compliance with Table 910-1 standards, but SS03 exceeded the Table 910-1 standard for TPH at a concentration of 4,600 mg/kg.

The results summary table, results figure, and laboratory analytical reports are attached.

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 sampling will be conducted at discrete locations in a grid across the area of impact. Soil samples will be collected on approximately 20' centers and from depths of 0 to 6 inches below ground surface. All samples will be analyzed for TPH as GRO and BTEX by USEPA Method 8260 and TPH as DRO by USEPA Method 8015. Approximately 4 samples collected from the centerline of the impacted area will also be submitted for analysis of EC USEPA Method 120.1, pH by USEPA Method 6020, and SAR by calculation.

Sampling will be scheduled for March 2018 after the ground has thawed. Work will be conducted earlier if weather conditions allow.

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 6

Number of soil samples exceeding 910-1 3

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 570

NA / ND

-- Highest concentration of TPH (mg/kg) 4600

-- Highest concentration of SAR 0.574

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 1

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?

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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Depending on the outcome of the site investigation, the remaining impacted material will either be excavated and disposed of at an authorized landfill or be remediated in place via application of the biological soil amendment Micro-Blaze.

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.

Depending on the outcome of the site investigation, the remaining impacted material will either be excavated and disposed of at an authorized landfill or be remediated in place via application of the biological soil amendment Micro-Blaze.

Soil Remediation Summary

In Situ

Ex Situ

Yes Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____

Natural Attenuation

Excavate and onsite remediation

Other _____

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.

NA

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Post site investigation sampling

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

Other Soil Remedial Progress report

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: _____

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.

Impacts limited to operating oil and gas production facility - no reclamation required

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. 08/07/2018

Actual Spill or Release date, if known. 08/06/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/23/2018

Date of commencement of Site Investigation. 03/01/2019

Date of completion of Site Investigation. 04/01/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____

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: `Dustin Watt _____

Title: Sr. EHS Specialist _____

Submit Date: ` 12/27/2018 _____

Email: dwatt@hpres.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: RICK ALLISON _____

Date: 01/04/2019 _____

Remediation Project Number: 12261 _____

COA Type**Description**

	Provide a status update within 30 days of the sampling event (by May 1, 2019)
	The vertical extent of impacts to soil must be defined. If any of the samples collected at 6 inches depth contain concentrations of TPH, BTEX or EC, pH, SAR that exceed the Table 9101- Concentration Levels, additional soil samples will be required to define the vertical extent of impacts.

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**

401841711	FORM 27-INITIAL-SUBMITTED
401843389	SITE MAP
401843392	SOIL SAMPLE LOCATION MAP
401843397	ANALYTICAL RESULTS
401843407	ANALYTICAL RESULTS
401843429	ANALYTICAL RESULTS

Total Attach: 6 Files

General Comments**User Group****Comment****Comment Date**

Environmental	Return to Draft for further revision	11/30/2018
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Total: 1 comment(s)