

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
401894410  
Receive Date:  
01/06/2019

Report taken by:  
ROB YOUNG

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>IMPETRO RESOURCES LLC</u>	Operator No: <u>10690</u>	<b>Phone Numbers</b>
Address: <u>2820 LOGAN DRIVE</u>		
City: <u>LOVELAND</u>	State: <u>CO</u> Zip: <u>80538</u>	Phone: <u>(970) 593-8626</u>
Contact Person: <u>Sam Bradley</u>	Email: <u>sbradley.impetro@gmail.com</u>	Mobile: <u>(970) 593-8626</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 12289 Initial Form 27 Document #: 401894410

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 type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project                                  |
| <input checked="" 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 <u>Inspection Document #688000227</u>                            |

SITE INFORMATION

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

Facility Type: <u>PIT</u>	Facility ID: <u>-99999</u>	API #: _____	County Name: <u>MORGAN</u>
Facility Name: <u>BOSLEY-61N56W 34SENW</u>		Latitude: <u>40.010234</u>	Longitude: <u>-103.636913</u>
		** correct Lat/Long if needed: Latitude: <u>40.015535</u>	Longitude: <u>-103.636678</u>
QtrQtr: <u>SENW</u>	Sec: <u>34</u>	Twp: <u>1N</u>	Range: <u>56W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Crop Land  
 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

N/A. Surrounded by crop land on South and Pasture on North

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |                                                          |                                                      |                                                   |
|----------------------------------------------------------|------------------------------------------------------|---------------------------------------------------|
| <input checked="" type="checkbox"/> <b>E&amp;P Waste</b> | <input 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 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	15'x10' pit berm, 10'x10' wellhead	COGCC Inspection

## INITIAL ACTION SUMMARY

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

At pit = onsite inspection shows no emergency response required. Dry stained soil present.  
 At wellhead = Tighten stuffing box rubbers. Dry stained soil present.  
 No free oil is present... dry stained soil is present

## 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 ):

Propose adequate soil samples taken from the pit berm after one year of biodegradation has occurred. Adequate samples would be taken to define successful or unsuccessful biodegradation by CGRS out of Fort Collins, CO.

### Proposed Groundwater Sampling

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

Dry stained soil only present

### Proposed Surface Water Sampling

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

No surface water present

## Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

Propose to remove stained soil around the wellhead/exterior pit berm and confirm stained soil has been adequately removed via visual and olfactory investigation.

# 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? Yes

Approximate areal extent (square feet) 250

### 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? Yes

Depth to groundwater (below ground surface, in feet)           

Number of groundwater monitoring wells installed           

Number of groundwater samples exceeding 910-1           

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

           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?

No impact to adjacent property or offsite

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?

Propose adequate soil samples taken from the pit berm after one year of biodegradation has occurred. Adequate samples would be taken to define successful or unsuccessful biodegradation by CGRS out of Fort Collins, CO.



# 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? \_\_\_\_\_

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.

Requesting permission to treat onsite. Move stained soil to be on the pit berm and enhance biodegradation by tilling. This plan is the most cost effective remediation plan. This initial clean up work would be completed in January of 2019 (weather permitting). In January of 2020 soil samples would be taken by CGRS out of Fort Collins. Based off the soil samples a plan to remove or continue the process would be evaluated. Please see attached map.

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? \_\_\_\_\_

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. \_\_\_\_\_

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/01/2019

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

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

### REMEDIAL ACTION DATES

Date of commencement of Remediation. 01/15/2019

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

### SITE RECLAMATION DATES

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

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

**OPERATOR COMMENT**

Please see attached map and proposed plan.

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

Signed: Sam Bradley

Title: Managing Member

Submit Date: 01/06/2019

Email: sbradley.impetro@gmail.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: ROB YOUNG

Date: 01/07/2019

Remediation Project Number: 12289

**COA Type****Description**

	Collect a composite soil sample to establish a baseline TPH concentration that can be compared to a second composite sample collected by October 1, 2019.
	Ensure thorough tilling of the oily material in order to facilitate active bioremediation. Ensure adequate moisture content of the treated soil and amendment incorporation as needed to foster bioremediation.

**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**

401894410	FORM 27-INITIAL-SUBMITTED
401894415	SITE MAP

Total Attach: 2 Files

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

Environmental	Changed location to correspond to the south side of the produced water pit berm.	01/07/2019
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Total: 1 comment(s)