

State of Colorado
Oil and Gas Conservation Commission

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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 INFORMATON

Name of Operator: <u>CONFLUENCE DJ LLC</u>	Operator No: <u>10518</u>	Phone Numbers
Address: <u>1001 17TH STREET #1250</u>		Phone: <u>(303) 226.9517</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Michael Dickinson</u>	Email: <u>mdickinson@confluencelp.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10338 Initial Form 27 Document #: 401290538

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 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 checked="" type="checkbox"/> Other <u>Notification of Change of Operator for Remediation Project</u> |

SITE INFORMATION

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

Facility Type: <u>LOCATION</u>	Facility ID: <u>320274</u>	API #: _____	County Name: <u>ADAMS</u>
Facility Name: <u>HASKINS-61S65W 4SWSW</u>	Latitude: <u>39.989750</u>	Longitude: <u>-104.674895</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>4</u>	Twp: <u>1S</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Dryland pasture, farming
 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? No

Other Potential Receptors within 1/4 mile

There is a domestic water well (DWR Permit #142528) reportedly located in the SW 1/4 SW 1/4 Section 4, T1S R65W and is expected to lie at higher elevation than the Haskins 1, and is upgradient to cross gradient of the Haskins 1 site. The Denver Hudson Canal is located approximately 950 feet to the northwest of the Haskins 1 site.

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 checked="" 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	GROUNDWATER	Defined: ~60 ft NW tank battery	Grab groundwater samples during investigation
Yes	SOILS	Approximate 40 ft by 60 ft by 30 ft	Limited subsurface investigation

INITIAL ACTION SUMMARY

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

Olsson performed a due diligence assessment of the Haskins 1 well location in April 2017 which included a limited subsurface investigation. The limited subsurface investigation identified subsurface soil and groundwater impacts at the location. The subsurface impacts are suspected of being the result of a former historic pit.

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):

A limited subsurface investigation was performed as part of a due diligence for a proposed transaction involving the Haskins 1. Soil samples will be collected using an excavator to remove unimpacted overburden and to segregate and stockpile impacted soil for offsite disposal, or onsite treatment to meet Table 910-1 concentrations or levels.

Proposed Groundwater Sampling

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

A limited subsurface investigation was performed as part of a due diligence for a proposed transaction involving the Haskins 1. Grab groundwater samples were collected that indicated petroleum hydrocarbon impacts. The extent of groundwater impacts will be assessed as part of the remediation efforts.

Proposed Surface Water Sampling

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

Surface water is not suspected of being impacted.

Additional Investigative Actions

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

Excavation and landfill disposal or shredding impacted soils have been proposed as the remediation strategy for the Haskins 1 site. Confirmation soil samples will be collected to demonstrate that the lateral and vertical extent of the impacts have been defined. If grab groundwater samples indicate that groundwater is impacted beyond the extent of excavation, additional investigation to include installation of groundwater monitoring wells will be recommended.

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? _____
Approximate areal extent (square feet) 2400

NA / ND

-- Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR _____
BTEX > 910-1 Yes
Vertical Extent > 910-1 (in feet) 29

Groundwater

Number of groundwater samples collected 25
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 30'
Number of groundwater monitoring wells installed 4
Number of groundwater samples exceeding 910-1 8

-- Highest concentration of Benzene (µg/l) 528
-- Highest concentration of Toluene (µg/l) 948
-- Highest concentration of Ethylbenzene (µg/l) 158
-- Highest concentration of Xylene (µg/l) 1960
-- Highest concentration of Methane (mg/l) 0

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?

Additional site investigation during excavation and remediation of impacted soils is 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.

Impacted soils will be excavated and disposed at a commercial landfill or shredded, and sampled for Table 910-1 parameters. The top soil, unimpacted overburden, and treated soils will be stockpiled onsite. Soils meeting the Table 910-1 concentrations/levels will be reused onsite. Impacted soil will be treated until it meets Table 910-1 concentrations/levels or will be disposed at a landfill.

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.

Impacted soils are to be excavated and disposed at a commercial landfill or shredded for reuse onsite. Unimpacted top soil and overburden soils will be segregated. The treated soils will be stockpiled onsite pending receipt of the soil analytical results. Confirmation soil results may need to be expedited prior to releasing equipment from the site.

Soil Remediation Summary

In Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

Yes Other It is expected that an in situ treatment, such as BOS 200, may be used in the excavation.

Ex Situ

Yes Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards) _____ 2500

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

Yes Other Soil Shredding _____

Groundwater Remediation Summary

Bioremediation (or enhanced bioremediation)

Chemical oxidation

Air sparge / Soil vapor extraction

Natural Attenuation

Yes Other Additional assessment and installation of groundwater monitoring wells will be evaluated.

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.

If groundwater impacts are expected beyond the excavation limits, an additional subsurface investigation to install groundwater monitoring wells will be performed.

REMEDIATION 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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

None

Volume of E&P Waste (solid) in cubic yards 700

E&P waste (solid) description Impacted soils from historic concrete vault - produced water

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: WM Buffalo Ridge, Keenesburg, CO

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

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? _____

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? _____

Does Groundwater meet Table 910-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

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.

The excavation will be secured with construction fence pending receipt of the soil analytical results. Top soil and unimpacted overburden will be segregated and stockpiled. Clean soil or treated soils will be placed back into the excavation in two foot lifts and will be compacted with the excavator as it goes. The site will be restored to its previous contour and grade. The area will be seeded with a dryland pasture mix approved by the surface owner.

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). 04/06/2017

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. 04/19/2017

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: James W. Hix, PG

Title: Agent Olsson Sr. Geologis

Submit Date: 01/30/2019

Email: jhix@olsson.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: 02/13/2019

Remediation Project Number: 10338

COA Type

Description

<u>COA Type</u>	<u>Description</u>

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

401924066	FORM 27-SUPPLEMENTAL-SUBMITTED
401924089	MONITORING REPORT

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)