

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402161642
Receive Date:
10/02/2019
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: HIGHPOINT OPERATING CORPORATION	Operator No: 10071	Phone Numbers Phone: (303) 312-8718 Mobile: (303) 518-2290
Address: 555 17TH ST STE 3700		
City: DENVER	State: CO	Zip: 80202
Contact Person: Rusty Frishmuth	Email: rfrishmuth@hpres.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 14358 Initial Form 27 Document #: 402161642

PURPOSE INFORMATION

- 901.e. Sensitive Area Determination
- 909.c.(1), Rule 905: Pit or PW vessel closure
- 909.c.(2), Rule 906: Spill/Release Remediation
- 909.c.(3), Rule 907.e.: Land treatment of oily waste
- 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure
- 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water
- Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b.
- Rule 909.e.(2)B.: Closure of remediation project
- Rule 906.c.: Director request
- Other

SITE INFORMATION

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

Facility Type: SPILL OR RELEASE	Facility ID: 467038	API #: _____	County Name: WELD
Facility Name: CC 30-26 PRV	Latitude: 40.887372	Longitude: -104.393268	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 26	Twp: 11N	Range: 63W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

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
UNDETERMINED	SOILS	16 acres	Drone imagery

INITIAL ACTION SUMMARY

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

On August 26, 2019, a spray release of a mixture of approximately 50 bbls crude oil and produced water occurred at the site. Southeasterly winds were prevalent at the time of the release and which distributed a mist of the released liquids approximately 1,500 feet south-southeast of the site crossing county road 124. The approximate width of impact is 500 feet in the northeast-southwest direction. On August 27, 2019, LT Environmental mapped the release extent using a drone equipped with GPS and a camera to fly and record aerial imagery. On August 28, 2019, Highpoint conducted raking to remove impact from the roadside ditches along county road 124 where observed. Absorbent pads were placed along the roadside ditches downgradient of impacts to prevent any mobilization of residual impact should precipitation/runoff occur. Additionally, moving of impacted vegetation and scraping of impacted soil began on August 29, 2019, and is currently underway. The impacted vegetation and soil are being transported offsite to a permitted disposal facility. A spectral frequency comparison map showing the area impacted by the release is included as an attachment.

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 will be collected throughout the impacted area on a 150 foot diamond shaped grid. Three of the samples will be collected from the road base of County Road 124. All samples will be collected from ground surface to 6 inches below grade and submitted to a laboratory for analysis of BTEX by EPA Method 8260, TPH-GRO by EPA Method 8260, TPH-DRO by EPA Method 8015, EC by EPA Method 120.1, pH by EPA Method 9045D, and SAR by EPA 6020/USDA60 6(2, 3A).

Additionally, background samples will be collected from the native range land and the road base of County Road 124 for laboratory analysis of EC, pH, and SAR using the aforementioned analytical methods.

The proposed sample locations are included as an attachment.

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 0
Number of soil samples exceeding 910-1 _____
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) _____

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? 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?

The release extended south crossing County Road 124 onto private property.

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.

Mowing of impacted vegetation and scraping of impacted soil for offsite disposal. Confirmation soil sampling will be conducted for comparison to applicable COGCC Table 910-1 standards and to confirm impacts are adequately mitigated.

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.

See above.

Soil Remediation Summary

In Situ

- Bioremediation (or enhanced bioremediation)
- Chemical oxidation
- Air sparge / Soil vapor extraction
- Natural Attenuation
- Other _____

Ex Situ

- Excavate and offsite disposal
- If Yes: Estimated Volume (Cubic Yards) _____ 0
- 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

- 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

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Following remedial action and confirmation sampling

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other Remediation summary and confirmation sampling 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

Volume of E&P Waste (solid) in cubic yards 50

E&P waste (solid) description Oil stained vegetation

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Waste Management - N Colorado landfill

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

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.

TBD

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. 08/26/2019

Actual Spill or Release date, if known. 08/26/2019

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/27/2019

Date of commencement of Site Investigation. 08/27/2019

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 08/28/2019

Date of completion of Remediation. _____

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: Rusty Frishmuth

Title: Director EHS

Submit Date: 10/02/2019

Email: rfrishmuth@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: 10/07/2019

Remediation Project Number: 14358

COA Type

Description

<u>COA Type</u>	<u>Description</u>
	Provide a status update, including soil sample analytical results, within 60 days (by December 6, 2019).

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

<u>Att Doc Num</u>	<u>Name</u>
402161642	FORM 27-INITIAL-SUBMITTED
402196359	SOIL SAMPLE LOCATION MAP

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)