

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402200719

Receive Date:

10/04/2019

Report taken by:

ALEX FISCHER

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 INFORMATION

Name of Operator: <u>LARAMIE ENERGY LLC</u>	Operator No: <u>10433</u>	Phone Numbers Phone: <u>(970) 8125311</u> Mobile: <u>(970) 2106889</u>
Address: <u>1401 SEVENTEENTH STREET #1401</u>		
City: <u>DENVER</u>	State: <u>CO</u> Zip: <u>80202</u>	
Contact Person: <u>Lorne C Prescott</u>	Email: <u>lprescott@laramie-energy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 14368 Initial Form 27 Document #: 402200719

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: <u>SPILL OR RELEASE</u>	Facility ID: <u>468517</u>	API #: _____	County Name: <u>MESA</u>
Facility Name: <u>Kobe-Chevron Valve Can</u>		Latitude: <u>39.366278</u>	Longitude: <u>-108.258312</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>NENE</u>	Sec: <u>18</u>	Twp: <u>8s</u>	Range: <u>97w</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Ranching

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

Reservoir Irrigation Ditch, Roan Creek is 950 to the North east but was not impacted by this release. the Colorado River is 5 miles downstream and was not believed to be impacted by this release.

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 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	1,200 feet	Visual and via sampling
UNDETERMINED	SURFACE WATER	Unknown	Visual and sampling

INITIAL ACTION SUMMARY

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

Fluids filled the valve can and migrated across the surface, down the CR 200 roadway, across additional surface and discharged into a flowing irrigation channel. The produced water flow was turned off as soon as it was discovered. Spill trailers were brought to the site and brought to bear within 20 minutes of discovery. Pumper/vac truck were also onsite to collect fluids. Sample was conducted along the path of the spill, both soils and water. Since the liquids were released to waters of the US we have also reported this to the Environmental Release Hotline. Roan Creek is approximately 200 feet from the point where the fluids entered the irrigation ditch. None of the fluids are believed to have entered Roan Creek or the Colorado River, but the irrigation ditch flows for a considerable distance in the direction of the Colorado River. Laramie staff was notified of fluid release at approximately 7:50 AM, October 1, 2019 from a private landowner. Laramie shut off the fluid flow by 8:00 am and notified contractors (D&B) to report to the site immediately. Spill trailers and Laramie staff were at the location at 8:15, absorbant socks and tube booms were applied to control residual flows. Fluid removal via vac trucks began at 8:45. Fluid from the spill migrated to the nearby Reservoir Irrigation Ditch. Laramie attempted to stop the flow completely but the headgate malfunctioned and flow through the ditch was reduced 50%. Sampling of soils and water began at 10:40 am when third party consultant arrived. Sampling of water was conducted from the point of entry to the irrigation ditch to the Colorado River (more than 5 miles downstream). Nearby Roan Creek was sampled as well. See diagrams attached to this submittal. Sampling efforts continued daily to date (October 4, 2019). Delineation of the spill and removal of impacted soils is ongoing as of the date of this report. Downstream ditchholders and water users were notified, see attached list.

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):

Sampling is being conducted at various locations along the spill path and in the irrigation ditch. a preliminary sampling map is attached to this report.

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):

Sampling is being conducted at various locations along the spill path and in the irrigation ditch. a preliminary sampling map is attached to this report.

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 5

Number of soil samples exceeding 910-1 5

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

Approximate areal extent (square feet) 50

NA / ND

NA Highest concentration of TPH (mg/kg)

NA Highest concentration of SAR

BTEX > 910-1 Yes

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

5 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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Excavation and scraping of impacted soils, transported to a licensed disposal facility.

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.

Impacted soils will be scraped and excavated as necessary beginning on October 5. Laramie's initial assessment has determined compacted soils were impacted by contaminants to depths of 1/2 to 1 inch. Sediment accumulations, more porous in nature appear to have been impacted to depths ranging from 8 to 12 inches. Flows from the release impacted soils along the roadway and across a series of natural drainages ranging in depth from a few inches to 3-4 feet. Each of the impacted drainages will be sampled and examined for impacts, soils will be removed and replaced according to impacts and per instructions of the landowner.

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) _____ 50
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

No _____ Bioremediation (or enhanced bioremediation)
No _____ Chemical oxidation
No _____ Air sparge / Soil vapor extraction
No _____ Natural Attenuation
No _____ 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.

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? _____

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.

Reclamation will be dependant upon the amount of remediation required and at the direction of the landowner.

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. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/01/2019

Date of commencement of Site Investigation. 10/01/2019

Date of completion of Site Investigation. 10/14/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/01/2019

Date of completion of Remediation. 10/14/2019

SITE RECLAMATION DATES

Date of commencement of Reclamation. 10/14/2019

Date of completion of Reclamation. 10/21/2019

OPERATOR COMMENT

Soil and water samples have been collected each day since the release of the fluids. No lab data is available as of the date of this submittal. Investigation, delineation and sample collection is ongoing. Details provided in this report related to sampling are preliminary in nature. total number of samples collected is an estimate and pending data collection. Details related to Table 910-1 constituent levels are based on preliminary Petroflag data. Further information should be available by October 7, 2019.

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

Signed: Lorne C Prescott

Title: Reg&Enviro Compliance

Submit Date: 10/04/2019

Email: lprescott@laramie-energy.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: ALEX FISCHER

Date: 10/10/2019

Remediation Project Number: 14368

COA Type**Description**

	Provide a Supplemental F27 describing mitigation and remediation activities taken to date, updated soil and surface water sample location maps, analytical data summarized in table format as well as laboratory reports.
	Upon approval of this Form 27 Site Investigation and Remediation Workplan and the generation of a Remediation Project number, the operator shall submit a Supplemental Form 19 requesting closure of Spill/Release Point ID #468517, with work proceeding under an approved Form 27.
	Surface disturbances shall be reclaimed in accordance with the 1000 Series Reclamation Regulations. Consult COGCC Reclamation Specialist regarding interim and/or final reclamation.
	This Site Investigation and Remediation Workplan (Form 27) is conditionally approved; however, additional information or activities may be required during the course of remediation.

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**

402200719	FORM 27-INITIAL-SUBMITTED
402200721	AERIAL IMAGE
402200723	SOIL SAMPLE LOCATION MAP
402200724	GROUND WATER SAMPLE LOCATION
402200725	GROUND WATER SAMPLE LOCATION
402200726	SOIL SAMPLE LOCATION MAP

Total Attach: 6 Files

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

Environmental	AFischer reviewed for SArauza.	10/10/2019
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Total: 1 comment(s)