

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402302314

Receive Date:

02/04/2020

Report taken by:

BOB CHESSON

## 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 INFORMATION

Name of Operator: GREAT WESTERN OPERATING COMPANY LLC	Operator No: 10110	<b>Phone Numbers</b>
Address: 1001 17TH STREET #2000		Phone: (720) 595-2132
City: DENVER	State: CO	Zip: 80202
Contact Person: Jason Davidson	Email: jdavidson@gwp.com	Mobile: ( )

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 14890

Initial Form 27 Document #: 402281201

#### 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 type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation                            | <input checked="" 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: LOCATION	Facility ID: 331146	API #: _____	County Name: WELD
Facility Name: GREAT WESTERN DURHAM 41-5		Latitude: 40.086200	Longitude: -104.454679
		** correct Lat/Long if needed: Latitude: 40.087341	Longitude: -104.455019
QtrQtr: NENE	Sec: 5	Twp: 1N	Range: 63W
		Meridian: 6	Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Agricultural

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

#### Other Potential Receptors within 1/4 mile

Low Line Canal in place 120 feet west, Wetlands in place 460 feet south, Irrigation pond in place 465 feet northwest, Lord Reservoir in place 1,030 feet south, Rural residential property in place 1,300 feet southwest

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- ☒ E&P Waste      ☐ Other E&P Waste      ☐ Non-E&P Waste
- ☒ Produced Water      ☐ Workover Fluids
- ☐ Oil      ☐ Tank Bottoms
- ☐ Condensate      ☐ Pigging Waste
- ☐ Drilling Fluids      ☐ Rig Wash
- ☐ Drill Cuttings      ☐ Spent Filters
- ☐ Pit Bottoms
- ☐ Other (as described by EPA)

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	SOILS	Excavated - Not impacted	Confirmation soil 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.

On January 8, 2020, Olsson visited the Site to collect confirmation soil samples from the walls and base of the produced water tank excavation. The excavation measured approximately 12 feet, by 15 feet, by 5 feet deep. Initial visual and olfactory observations and photoionization detector (PID) readings indicated the potential presence of impacted soil within the excavation. Therefore, Olsson directed additional excavation vertically and in each cardinal direction. The final extent of the excavation measured approximately 25 feet, by 18 feet, by 7 feet deep. Five discreet confirmation soil samples were collected (4 wall and 1 base) from the excavation. Each sample was analyzed for benzene, toluene, ethylbenzene, total xylenes (BTEX), total petroleum hydrocarbons (TPH)- gasoline range organics (GRO), and TPH- diesel range organics (DRO). The base and wall sample from the south wall were also analyzed for naphthalene. In addition, the base sample was analyzed for pH, Electrical Conductivity (EC), and Sodium Absorption Ratio (SAR). Concentrations of BTEX, naphthalene, TPH-GRO, and TPH-DRO were either not detected at or above laboratory reporting limits or were reported below their respective Table 910-1 concentration levels in the samples collected from the base, east wall, west wall, and south wall of the excavation. TPH concentrations in the sample from the north wall of the excavation were reported at 503 milligrams per kilogram (mg/kg), which is above the Table 910-1 concentration level of 500 mg/kg. Concentrations of TPH-GRO and TPH-DRO were added to calculate TPH. The results for pH, EC, and SAR associated with the base sample from 7 feet below ground surface were reported within their respective Table 910-1 concentration ranges. See the attached laboratory report, analytical summary Table 1, and Figure 3.

## 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 ):

Please refer to the Remediation Summary section on the Remedial Action Plan tab of this Form 27.

### 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 1

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 500

### NA / ND

-- Highest concentration of TPH (mg/kg) 503

-- Highest concentration of SAR 4.49

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 6

### 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

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.

Approximately 151 cubic yards of impacted soil was transported offsite under Great Western manifest to Waste Management's Buffalo Ridge Landfill (a licensed disposal facility) located in Keenesburg, Colorado. Copies of the waste manifests are attached.

## 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.

On January 9, 2020, over-excavation activities commenced to address the TPH concentrations reported above Table 910-1 concentration levels in the confirmation soil sample collected from the north wall of the initial excavation (NSW-5). Based on field observations and PID readings, Olsson directed the excavation contractor to excavate an additional 2 feet north along the north wall of the excavation. One confirmation soil re-sample (NSW-5S) was collected and analyzed for BTEX, TPH-GRO, and TPH-DRO. Concentrations of BTEX, TPH-GRO, and TPH-DRO were either not detected at or above laboratory reporting limits or were reported below their respective Table 910-1 concentration levels, serving as confirmation that impacted soils along the north wall of the initial excavation have been successfully removed. See the attached laboratory report, analytical summary Table 1, and Figure 3.

## 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) \_\_\_\_\_ 151  
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.

Groundwater was not encountered.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Remediation Progress/Closure Report

**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 150

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Waste Manatement's Buffalo Ridge Landfill, 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: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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? Yes

Is additional groundwater monitoring to be conducted? No

## 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.

If necessary, the site will be reclaimed in accordance with COGCC 1000 series rules.

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). \_\_\_\_\_ 01/08/2020

Date of commencement of Site Investigation. \_\_\_\_\_ 01/08/2020

Date of completion of Site Investigation. \_\_\_\_\_ 01/09/2020

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. \_\_\_\_\_ 01/08/2020

Date of completion of Remediation. \_\_\_\_\_ 01/09/2020

### **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: Jason Davidson

Title: Senior EHS Specialist

Submit Date: 02/04/2020

Email: jdavidson@gwp.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: BOB CHESSON

Date: 02/04/2020

Remediation Project Number: 14890

**COA Type****Description**

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**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**

402302314	FORM 27-SUPPLEMENTAL-SUBMITTED
402302937	DISPOSAL MANIFESTS
402302939	SOIL SAMPLE LOCATION MAP
402302964	ANALYTICAL RESULTS
402302969	ANALYTICAL RESULTS
402302971	ANALYTICAL RESULTS

Total Attach: 6 Files

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

Environmental	<p>Based on the information presented no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.</p> <p>For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>	02/04/2020
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Total: 1 comment(s)