FORM 27 Rev 3/16

State of Colorado
Oil and Gas Conservation Commission

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Receive Date: 03/31/2020
Report taken by: PETER GINTAUTAS

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: TOP OPERATING COMPANY Operator No: 39560
Address: 3609 S WADSWORTH BLVD STE 340
City: LAKEWOOD State: CO Zip: 80235
Contact Person: Paul Herring Email: paul.herring@topoperating.com

Phone Numbers
Phone: (303) 727-9915
Mobile: ( )

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15373 Initial Form 27 Document #: 402358048

PURPOSE INFORMATION

- [ ] 901.e. Sensitive Area Determination
- [x] 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: LOCATION Facility ID: 317954 API #: County Name: WELD
Facility Name: COUNTER-62N66W 30NENE Latitude: 40.114618 Longitude: -104.813031
** correct Lat/Long if needed: Latitude: 40.114445 Longitude: -104.812829
QtrQtr: NENE Sec: 30 Twp: 2N Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications: SC
Most Sensitive Adjacent Land Use: Proximity to Spear Canal (surface water) and water well
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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

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

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	potential soil impacts	lab results following sample collection
UNDETERMINED	SOILS	potential groundwater impacts	lab results following sample collection

INITIAL ACTION SUMMARY

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

Remove the partially-buried produced water vessel. Over-excavate any impacted soils or groundwater if encountered.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

- [x] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Five grab soil samples will be collected for field screening via photoionization detector (PID). One sample from the floor of the excavation and one sample from each sidewall of the excavation will be collected for field screening. The soil sample collected from the floor and the sidewall exhibiting the highest PID reading will be submitted for laboratory analysis of BTEX, TPH-GRO, and TPH-DRO. The sidewall soil sample (if <3 feet bgs) will also be submitted for laboratory analysis of inorganics (EC, pH, SAR). In addition, three grab soil samples from nearby non-impacted native soil will be collected for the purpose of establishing background conditions (EC, pH, SAR).

Proposed Groundwater Sampling

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

If groundwater is encountered within the excavation a groundwater sample will be collected and submitted for laboratory analysis of BTEX.

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 exceeeding 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?

☐ 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.

Any soil impacted above COGCC Table 910-1 regulatory limits will be excavated from the site and disposed of at an approved facility. Impacted soil in exceedance of Table 910-1 regulatory limits for only EC, SAR, pH will not be removed below the root zone (established at 3 ft below ground surface, per COGCC guidance).

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.

Remediation action plan summary will be developed if necessary following receipt of the laboratory analytical results.

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) _____

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.

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.

Following excavation activities, the location will be backfilled, compacted, and re-contoured to match pre-existing conditions.

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. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/02/2020

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

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

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

Signed:` Paul Herring Title: Landman

Submit Date:` 03/31/2020 Email: paul.herring@topoperating.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: PETER GINTAUTAS Date: 03/31/2020

Remediation Project Number: 15373

COA Type	Description
	Submit supplemental form 27 to provide details of site investigation including site map, analytical summary including field screening data and analytical reports within 45 days following removal of produced water vessel.

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
402358048	FORM 27-INITIAL-SUBMITTED
402358116	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

General Comments

User Group	Comment	Comment Date
Environmental	coordinates provided are of production facilities on location 317954. Battery is not assigned a facility number in COGCC database.	03/31/2020

Total: 1 comment(s)