

State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402365913

Receive Date:

05/27/2020

Report taken by:

John Heil

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>RIO MESA RESOURCES INC</u>	Operator No: <u>74740</u>	Phone Numbers
Address: <u>P.O. BOX 984</u>		Phone: <u>(970) 675-8491</u>
City: <u>RANGELY</u> State: <u>CO</u> Zip: <u>81648</u>		Mobile: <u>(970) 6202257</u>
Contact Person: <u>Mike Hayes</u>	Email: <u>hayespetroleum@gmail.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15643 Initial Form 27 Document #: 402365913

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 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>PIT</u>	Facility ID: <u>117370</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PHILLIPS-NEWTON 1-2</u>	Latitude: <u>40.079526</u>	Longitude: <u>-108.812814</u>	
	** correct Lat/Long if needed: Latitude: <u>40.078410</u>	Longitude: <u>108.811688</u>	
QtrQtr: <u>SESW</u>	Sec: <u>2</u>	Twp: <u>1N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Public buildings & residential

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

An ephemeral drainage is located approximately 915 feet to the south/southwest as well as 1,455 feet to the north. Both tributaries of the White River. Nearest surface water is the White River located ~4355 feet to the northwest. Nearest water well is a "monitoring well" located ~2,432 feet to the north. Monitoring well was installed to a depth of 25 feet and the elevation difference is ~90 feet, suggesting that groundwater is 75-100 feet below the ground surface.

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
UNDETERMINED	SOILS	>5	Field screening and analytical sample results

INITIAL ACTION SUMMARY

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

Site characterization will consist of hand auguring and collecting samples at every one (1) foot interval to a maximum five (5) feet on the pit bottom floor and side walls, as that is the maximum depth possible by the hand augur. Field screening will consist of a Photoionizing Detection Unit (PID) and Petroflag Hydrocarbon Analyzer (Petroflag). Samples will be collected from the interval that contains the highest field screening reading and submitted to the laboratory for full COGCC Table 910-1. Additional site investigation, remediation and sampling will be pending the initial sample results.

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):

Five samples will be collected, four (4) from the each of the side walls and one (1) from the bottom of the pit floor at the intervals that contain the highest field screening reading within a five foot column.

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 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) 500

NA / ND

-- Highest concentration of TPH (mg/kg) 16331
-- Highest concentration of SAR 68.6
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 5

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 100'
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 910-1 0

-- 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
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?

Three (3) background samples were collected from nearby off pad locations and analyzed for arsenic and inorganics (SAR/EC/pH).

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?

The pit bottom and southern side wall at five (5) feet exceed COGCC Table 910-1 for TPH, as well as all of the side walls for inorganics (EC & SAR). Arsenic exceeds Table 910-1 as well, but concentrations are comparable to background levels.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soils will be excavated via backhoe/trackhoe and stockpiled onsite. Field screening instruments (PID and Petroflag) will be utilized to guide the excavation to determine when excavation can be stopped and additional confirmation samples collected. Additional vertical and southern wall delineation via heavy equipment is necessary.

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.

Soil exceeding Table 910-1 for hydrocarbon (TPH) and inorganics will be excavated via backhoe/trackhoe. Once confirmation samples indicate the pit subsoils satisfy Table 910-1 thresholds, the pit will be backfilled with clean native soil consistent with the surrounding material. Rio Mesa Resources is requesting to landfarm the soils onsite. If landfarming is approved, a separate landfarming management plan will be submitted via Supplemental Form 27. If landfarming is denied, the soils will be profiled and hauled off site to an approved waste disposal facility.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 0

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____ 0

_____ Natural Attenuation

Yes _____ Excavate and onsite remediation

_____ Other _____

Yes _____ Land Treatment

Yes _____ Bioremediation (or enhanced bioremediation)

No _____ Chemical oxidation

No _____ 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.

It is not anticipated that groundwater is impacted at this time. Should groundwater impacts be encountered, a separate groundwater monitoring plan will be submitted via Supplemental Form 27

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other Remediation Planning
Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other Pit Closure Remediation

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:

Waste will be generated and disposition is currently TBD

Volume of E&P Waste (solid) in cubic yards 0

E&P waste (solid) description TBD

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

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.

The pit will be reclaimed to the present grade of the location or to the approximate original contour of the landscape and consistent with the 1000-series Rule.

Seeding of the disturbed area will be performed in accordance with its' intended use. The seed mix will be prescribed by the landowner. There are no known noxious weeds in the immediate area of the disturbance.

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? Yes

If NO, does the seed mix comply with local soil conservation district recommendations? Yes

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). 04/08/2020

Date of commencement of Site Investigation. 05/20/2020

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

Please forward onto John Heil

Location: Phillips Newton 2-1

Location ID: 315237

Pit ID: 117370 (Bass Enterprises Production Co.)

This initial Form 27 is also serving as a Supplemental Form 27 to obtain a REM# for the pit closure process, but also present initial sampling results for the pit bottom and side walls.

The sampling and analysis indicate that soils exceed COGCC Table 910-1 thresholds for TPH and on pit bottom and southern side wall to a depth of 5 feet. Upon approval of this Form 27, Rio Mesa Resources will excavate the impacted soil and landfarm onsite (if approved) or haul off site to an approved waste disposal facility. The vertical and southern horizontal extent of impacts have not yet been determined, but upon completion of remediation, updated information will be provided within Supplemental Form 27's.

Please note that the pit is listed under Bass Enterprises Production Co. and lat/long coordinates on the COGCC GIS show the pit ~500 feet to the northwest. Additionally, the Form 15 (Doc# 684957 - see attachments) indicates the pit should be listed as Phillips Newton 2-1, however the COGCC database indicates Phillips Newton 1-2.

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

Signed: Mike Hayes _____

Title: owner _____

Submit Date: 05/27/2020 _____

Email: hayespetroleum@gmail.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: John Heil _____

Date: 06/18/2020 _____

Remediation Project Number: 15643 _____

COA Type

Description

	Surface disturbances shall be reclaimed in accordance with the 1000 Series Reclamation Regulations. Consult COGCC Reclamation Specialist regarding interim and/or final reclamation.
	Based on the elevated TPH-DRO and the proximity to Rangely Town limits, elementary school and recreation area, COGCC does not approve the landfarming of impacted material. Operator shall comply with rule 907.e.(1).A.
	FIR Doc # 6969201138 referenced oily soil near the tank battery. Additional soil sampling shall be performed to delineate horizontal and vertical impacts in and around the former tank battery.
	Operator shall provide the date at which Well API #103-08118 was plugged and abandoned and when the equipment on location was removed.

Approval/Passing of the form 27 is not an endorsement of the reclamation plan that has been attached/included with this F27; Location will need to meet 1000 series reclamation requirements in order to pass final reclamation. A field inspection will be conducted at a future date to evaluate compliance with reclamation standards.

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.

<u>Att Doc Num</u>	<u>Name</u>
402365913	FORM 27-INITIAL-SUBMITTED
402402218	ANALYTICAL RESULTS
402402220	ANALYTICAL RESULTS
402402224	ANALYTICAL RESULTS
402402226	SOIL SAMPLE LOCATION MAP
402407022	OTHER

Total Attach: 6 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	As indicated on Project, Purpose, & Site Information tab under Site Conditions and Most Sensitive Land Use is Public buildings & residential. Location is less than 100 feet from Rangely Town limits and approximately 450 from an elementary school. Location is on FEE surface with public access and what appears to be active recreational use less than 300 feet north to northeast of the Location.	06/18/2020
Environmental	Constituents of concern are mainly TPH-DRO which would be more challenging to remediate and would need an aggressive landfarming treatment program.	06/04/2020

Total: 2 comment(s)