

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402449041

Receive Date:

07/29/2020

Report taken by:

Steven Arauza

## 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: CHEVRON USA INC	Operator No: 16700	<b>Phone Numbers</b>
Address: 100 CHEVRON ROAD		Phone: (832) 854-5620
City: RANGELY State: CO Zip: 81648		Mobile: (832) 270-3436
Contact Person: Adriane Gifford	Email: agifford@chevron.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 14816

Initial Form 27 Document #: 402191055

#### 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 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 checked="" 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: CENTRALIZED EP WASTE MGMT FAC	Facility ID: 149002	API #: _____	County Name: RIO BLANCO
Facility Name: WILSON CREEK LANDFARM	Latitude: 40.191414	Longitude: -107.907919	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 35	Twp: 3N	Range: 94W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Recreational

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? Yes

Other Potential Receptors within 1/4 mile

# 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
Yes	SOILS	Confined to Landfarm Cell 2	Permitted E&P Waste Facility

## INITIAL ACTION SUMMARY

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

Semi-annual monitoring and sampling at the Centralized Exploration and Production (E&P) Waste Management Facility (Cell 2).

## 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 ):

Following soil excavation, up to nine (9) confirmation soil samples will be collected as follows: Three (3) floor samples will be collected from the excavation floor and six (6) sidewall samples will be collected from the excavation sidewall.

### 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 ):

Please find the attached "Wilson Creek Landfarm - 2020 Background Arsenic Determination" dated July 29, 2020 requesting the Concentration Level of arsenic for the Landfarm Remediation project be established at 11.70 mg/kg.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 15

Number of soil samples exceeding 910-1 15

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

Approximate areal extent (square feet) 23136

### NA / ND

-- Highest concentration of TPH (mg/kg) 44

-- Highest concentration of SAR 7.51

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 10

### 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?

Please find the attached "Wilson Creek Landfarm - 2020 Background Arsenic Determination" dated July 29, 2020 requesting the Concentration Level of arsenic for the Landfarm Remediation project be established at 11.70 mg/kg.

☐ 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.

Excavation of Cell 2 to remove soils above the COGCC Table 910-1.

## 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.

Please find the attached "Wilson Creek Landfarm - 2020 Background Arsenic Determination" dated July 29, 2020 requesting the Concentration Level of arsenic for the Landfarm Remediation project be established at 11.70 mg/kg.

The purpose of this workplan is to describe the activities to remove impacted soils from Cell 2 and request closure for the Landfarm. Hydrocarbon contaminated soil has not been added to Cell 2 since September 2014 and based on analytical data collected, both TPH and arsenic concentrations in soil are above COGCC Table 910-1 concentration levels. Due to the relatively high concentrations of TPH and arsenic remaining in Cell 2, Chevron has decided to remove Cell 2 through excavation and offsite disposal. This workplan describes the soil excavation and confirmation sampling proposed to remove Cell 2 and request closure of the Landfarm.

Prior to the excavation, three (3) monitoring wells (MW-48R, MW-49, and MW-50) will be properly abandoned per State of Colorado rules and regulations for water well construction, pump installation, cistern installation, and monitoring and observation hole/well construction (2 Code of Colorado Regulations [CCR] 402-2). Groundwater samples collected at the Landfarm monitoring wells have never exceeded COGCC 910-1 Concentrations Levels since installed.

All soils will be excavated to the vertical extent of impacted soil within Cell 2, approximately three (3) to five (5) feet below ground surface (bgs), and directly loaded into trucks for transportation to the Wray Gulch Landfill for disposal. The excavation will begin where Cell 1 excavation activities ended (Figure 1). Following soil excavation, up to nine (9) confirmation soil samples will be collected. Waste manifests will be collected for the final documentation report and submitted on a supplemental eForm 27 when project closure is requested.

## 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) \_\_\_\_\_ 4800

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.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other Ongoing

**Report Type:** ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report  
☒ Other Remediation Documentation 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:

None

Volume of E&P Waste (solid) in cubic yards 4800

E&P waste (solid) description Soils above COGCC Table 910-1  
Concentration Levels in Centralized  
E&P Waste Management Facility

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

Non-COGCC Disposal Facility: Wray Gulch 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: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

Do all soils meet Table 910-1 standards? No

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? Yes

Does Groundwater meet Table 910-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

## 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 remediation of soil above 910-1 Concentration Levels, Chevron as the property owner would like to continue to use this area as a storage/laydown yard for existing operations and will request a variance from the COGCCs reclamation unit. Chevron plans to leave the fence and surrounding stormwater controls in place for continued use as a storage area.

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). \_\_\_\_\_

Date of commencement of Site Investigation. \_\_\_\_\_

Date of completion of Site Investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. 06/01/2020  
\_\_\_\_\_

Date of completion of Remediation. 09/30/2020  
\_\_\_\_\_

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

Attention: Mr. Steven J. Arauza, P.G.  
Environmental Protection Specialist  
Colorado Oil and Gas Conservation Commission  
Department of Natural Resources  
Phone 303.894.2100, ext. 5689|Cell 720.498.5298  
818 Taughenbaugh Blvd, Suite 103, Rifle, CO 81650  
steven.arauza@state.co.us

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

Signed: Christopher Beall

Title: Associate Geologist

Submit Date: 07/29/2020

Email: Christopher.Beall@stantec.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: Steven Arauza

Date: 07/30/2020

Remediation Project Number: 14816

**COA Type****Description**

	<p>Under Reclamation Planning, operator indicates that "Chevron as the property owner would like to continue to use this area as a storage/laydown yard for existing operations and will request a variance from the COGCCs reclamation unit."</p> <p>Operator shall coordinate with the COGCC Reclamation Inspector, L. Colby, and COGCC Reclamation unit regarding a timely submittal of the referenced variance request as well as compliance with the COGCC 1000-Series reclamation requirements.</p>
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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**

402449041	FORM 27-SUPPLEMENTAL-SUBMITTED
402450531	OTHER
402455251	OTHER

Total Attach: 3 Files

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

Environmental	Based on the information provided in the attachment dated July 29, 2020 (doc #402455251), the COGCC approves of the operator's request to consider an arsenic background concentration of 11.7 mg/kg.	07/30/2020
Environmental	The COGCC does not approve of the operator's requests outlined in the attachment dated July 23, 2020 (doc #402450531).	07/29/2020
Environmental	Approval of this form 27 is not an endorsement of the reclamation plan that has been included in this document; 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.	07/24/2020

Total: 3 comment(s)