

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402494201
Receive Date:
09/21/2020
Report taken by:
KRIS NEIDEL

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: <u>ROBERT L BAYLESS PRODUCER LLC</u>	Operator No: <u>6720</u>	Phone Numbers
Address: <u>621 17TH ST STE 2300</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80293</u>
Contact Person: <u>HELEN TRUJILLO</u>	Email: <u>NOTICES@RLBAYLESS.COM</u>	
		Phone: <u>(303) 2969900</u>
		Mobile: <u>(505) 3302593</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 10638 Initial Form 27 Document #: 401403305

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 checked="" 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>WELL</u>	Facility ID: _____	API #: <u>081-05172</u>	County Name: <u>MOFFAT</u>
Facility Name: <u>GOV'T-POHLMAN 2</u>	Latitude: <u>40.326990</u>	Longitude: <u>-107.602950</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>15</u>	Twp: <u>4N</u>	Range: <u>91W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use CTB Location

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

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 type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" 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
No	SOILS	Minor	Soil was put on site for landfarming

INITIAL ACTION SUMMARY

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

n/a

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):

We are estimating 222 cu ft of landfarmed soil. Will take two TPH & BTEX samples and a full Table 910-1 sample.
 UPDATE 10/21/2019: Original estimate on landfarm was exaggerated. HRL Compliance collected soil samples on 10/08/2019 and estimate landfarm is 50 cu yds. See attached Analytical Results showing TPH exceeds Table 910-1 parameters.
 UPDATE 04/11/2020: In this unprecedented time, Robert L. Bayless, Producer (RLB) is requesting delaying work on the following projects until we are able to perform it safely and economically. We are estimating to resume in 2021.
 UPDATE 07/14/2020: Requesting delay due to economics & safety.
 UPDATE 09/21/2020: Landfarm is removed and Bayless will perform one 5-pt composite soil sample on the location where the landfarm was. Estimated time to be sampled week of 09/21/2020 or 09/28/2020, when consultant has technician available.

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 2
Number of soil samples exceeding 910-1 2
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 3520
-- Highest concentration of SAR 0.174
BTEX > 910-1 No
Vertical Extent > 910-1 (in feet) 2

Groundwater

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

Highest concentration of Benzene (µg/l) 0
Highest concentration of Toluene (µg/l) 0
Highest concentration of Ethylbenzene (µg/l) 0
Highest concentration of Xylene (µg/l) 0
Highest concentration of Methane (mg/l) 0

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?

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?

UPDATE 09/21/2020: Per request from COGCC, Bayless will perform one 5-pt composite soil sample on the location where the landfarm was. Estimated time to be sampled week of 09/21/2020 or 09/28/2020, when consultant has technician available.

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.

There is no source, it is a landfarm placed on site. We will stop using as a land farm.

UPDATE 10/21/2019: We would like to haul landfarm soil to Moffatt County Landfill after Thanksgiving, weather permitting. Hunting season does not allow us to drive on location with backhoes and dump trucks until then. If weather doesn't permit, we would like to haul away in Spring 2021 as soon as weather permits.

UPDATE 01/02/2020: Snow/Moisture has not allowed equipment to be able to get to well site without damaging roads since Thanksgiving 2019. Will haul land farm in Spring 2020 as weather permits.

UPDATE 02/04/2020: Snow/Moisture has not allowed equipment to be able to get to well site without damaging roads since Thanksgiving 2019. Will haul land farm in Spring 2020 as weather permits.

UPDATE 03/03/2020: Snow/Moisture has not allowed equipment to be able to get to well site without damaging roads since Thanksgiving 2019. Will haul land farm in Spring 2020 as weather permits.

UPDATE 04/11/2020: In this unprecedented time, Robert L. Bayless, Producer (RLB) is requesting delaying work on the following projects until we are able to perform it safely and economically. We are estimating to resume in 2021.

UPDATE 07/14/2020: Requesting delay due to economics & safety.

UPDATE 09/21/2020: Landfarm is removed and was taken to Moffat County Landfill. When receipts and manifest received, will update this report.

REMIEDIATION 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.

We would like to continue turning the soil and test in Summer 2018.

UPDATE 10/21/2019: We would like to haul landfarm soil to Moffatt County Landfill after Thanksgiving, weather permitting. Hunting season does not allow us to drive on location with backhoes and dump trucks until then. If weather doesn't permit, we would like to haul away in Spring 2021 as soon as weather permits.

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Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 50

_____ Air sparge / Soil vapor extraction

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

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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.

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.

We would like to continue turning the soil for landfarming and test in Summer 2018. Once soil is found to be remediated, would like to spread out at wellsite. Seeding n/a at this time since this is working wellsite.

UPDATE 10/21/2019: We would like to haul landfarm soil to Moffatt County Landfill after Thanksgiving, weather permitting. Hunting season does not allow us to drive on location with backhoes and dump trucks until then. If weather doesn't permit, we would like to haul away in Spring 2021 as soon as weather permits.

UPDATE 01/02/2020: Snow/Moisture has not allowed equipment to be able to get to well site without damaging roads since Thanksgiving 2019. Will haul land farm in Spring 2020 as weather permits.

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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). 09/25/2017

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

REMEDIAL ACTION DATES

Date of commencement of Remediation. 03/15/2021

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

UPDATE 09/21/2020: Landfarm is removed and Bayless will perform one 5-pt composite soil sample on the location where the landfarm was. Estimated time to be sampled week of 09/21/2020 or 09/28/2020, when consultant has technician available. When the actual date is scheduled, we will notify Kris Neidel via email.

When lease operator mails in receipts and manifest from the landfarm, we will update this report.

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

Signed: HELEN TRUJILLO _____

Title: PROD & REG ANALYST _____

Submit Date: 09/21/2020 _____

Email: NOTICES@RLBAYLESS.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: KRIS NEIDEL _____

Date: 09/21/2020 _____

Remediation Project Number: 10638 _____

COA Type**Description**

	A minimum of one sample for Full Table 910-1 shall be collected from below the area of stored soil. Rule 910-b(3)B should be used for sample location selection.
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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**

402494201	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)