

# 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:

402500568

Receive Date:

09/30/2020

Report taken by:

CHRIS CANFIELD

## 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 #: 12383

Initial Form 27 Document #: 401898095

#### 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 checked="" 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: LOCATION     | Facility ID: 335863 | API #:   | County Name: ADAMS     |
| Facility Name: Sauvage 12-7 |                     | Latitude: 39.984260                                | Longitude: -104.937470 |
|                             |                     | ** correct Lat/Long if needed: Latitude: 39.985795 | Longitude: -104.932459 |
| QtrQtr: NWNW                | Sec: 7              | Twp: 1S  | Range: 67W             |
|                             |                     | Meridian: 6  | Sensitive Area? Yes    |

#### SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Agricultural, Unnamed tributary to Big Dry Creek

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? Yes

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

Residential property 600 feet to the north, German Reservoir No. 1 in place 970 feet to the north/northwest, Unnamed Reservoir in place 1,330 feet to the north/northeast

# 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       | GROUNDWATER    | Area surrounding MW-4               | Subsurface Investigations/Quarterly Sampling |
| Yes       | SOILS          | 35'x16' impacted from 6' to 11' bgs | Subsurface Investigations                    |

## 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 5/28/19, a soil boring investigation was conducted. 8 borings were advanced to 14' below ground surface (bgs) surrounding the source area. Soil staining was observed from ~6' to 11' bgs. 1 soil sample from each boring was submitted to Origins Laboratory (Origins) for analysis based on the highest field screening readings using a PID. Origins analyzed the samples for total petroleum hydrocarbons (TPH)- gasoline range organics (GRO) and TPH-diesel range organics (DRO). Concentrations of TPH-GRO and TPH-DRO were added to calculate TPH. TPH concentrations were reported below the Table 910-1 concentration level of 500 milligrams per kilogram (mg/kg) in soil samples from SB-1, SB-2, and SB-4 - SB-9. TPH concentrations were reported at 598.5 mg/kg in the soil sample from 10' bgs in SB-3, which is above the Table 910-1 concentration level. Groundwater was encountered at ~8' bgs. 2 of the 8 borings were converted into monitoring wells. On 5/31/20, an additional subsurface investigation was conducted in the source area. 5 borings were advanced to depths ranging from 15' to 23' bgs. Soil staining was observed from ~7' to 10' bgs. One soil sample from each boring was submitted to Origins for analysis based on the highest field screening readings using a PID. Origins analyzed the samples for benzene, toluene, ethylbenzene, and total xylene (BTEX), TPH-GRO, and TPH-DRO. Concentrations of BTEX were either not detected at or above laboratory reporting limits or were reported below their respective Table 910-1 concentration levels. TPH concentrations were not detected at or above laboratory reporting limits in the samples from MW-3 and MW-5 and were reported below the Table 910-1 concentration level in the samples from SB-10 and S-11. TPH concentrations were reported at 510 mg/kg in the sample from 10' bgs in boring MW-4, which is above the Table 910-1 concentration level. Groundwater was encountered at ~7.5' bgs. 3 of the 5 borings were converted into monitoring wells.

## 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 under 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 ):

Please refer to the Groundwater Monitoring section under the Remedial Action Plan tab of this Form 27.

### 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 exceeding 910-1           

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

Approximate areal extent (square feet) 560

### NA / ND

NA Highest concentration of TPH (mg/kg)           

NA Highest concentration of SAR           

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 11

### Groundwater

Number of groundwater samples collected 5

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 9'

Number of groundwater monitoring wells installed 5

Number of groundwater samples exceeding 910-1 1

-- Highest concentration of Benzene (µg/l) 6.94

ND Highest concentration of Toluene (µg/l)           

-- Highest concentration of Ethylbenzene (µg/l) 435

-- Highest concentration of Xylene (µg/l) 6.28

NA 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?

☐ 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.

Great Western will either dig and haul or treat any soils onsite that exceed Table 910-1 concentration levels.

## 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.

Great Western proposes to re-evaluate the remediation approach following the fourth quarter sampling event in December 2020. A Form 27 Supplemental will be submitted for COGCC approval prior to conducting the proposed remediation activities.

Groundwater is addressed in the Groundwater Monitoring section under below.

## 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.

On 9/15/20, groundwater samples from all 5 wells were collected and delivered to Origins for BTEX analysis. Concentrations of BTEX were not reported at or above laboratory detection limits in the samples collected from monitoring wells MW-1, MW-2, MW-3, and MW-5. Benzene concentrations in the sample collected from monitoring well MW-4 was reported at 6.94 micrograms per liter (µg/L) which is above the COGCC Table 910-1 concentration level for benzene in groundwater of 5.0 µg/L. Concentrations of TEX in the sample from MW-4 were either not reported at or above laboratory detection limits or were reported below their respective Table 910-1 concentration levels. Groundwater was encountered in the monitoring wells from 6.96 feet to 9.59 feet below the top of casing in each well and was calculated to flow to the south across the Site. See the attached Figure 2 depicting the location of the monitoring wells and groundwater analytical results. See Table 1 for a summary of the groundwater analytical results. A copy of the laboratory analytical report is also attached. Refer to Figure 3 for an illustration of the groundwater elevation and flow direction during the September 15, 2020 sampling event. Great Western proposes to continue sampling groundwater from all five monitoring wells for BTEX analysis on a quarterly basis, with the next event scheduled for mid-December 2020. Monitoring well MW-2 will be used as the point of compliance well. Following the receipt of four consecutive quarters of groundwater analytical results below Table 910-1 concentration levels for BTEX, no further action will be requested for Remediation Project #12383.

## 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? No \_\_\_\_\_

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: \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION COMPLETION SUMMARY

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

Do all soils meet Table 910-1 standards? \_\_\_\_\_

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? \_\_\_\_\_

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.

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). 07/13/2015

Date of commencement of Site Investigation. 05/28/2019

Date of completion of Site Investigation. 04/01/2020

### 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: Jason Davidson

Title: Senior EHS Specialist

Submit Date: 09/30/2020

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: CHRIS CANFIELD

Date: 10/06/2020

Remediation Project Number: 12383

### COA Type

### Description

|  |  |
|--|--|
|  |  |
|--|--|

### 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

|           |                                |
|-----------|--------------------------------|
| 402500568 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 402500570 | ANALYTICAL RESULTS             |
| 402500571 | ANALYTICAL RESULTS             |
| 402500572 | GROUND WATER SAMPLE LOCATION   |
| 402500573 | GROUND WATER ELEVATION MAP     |

Total Attach: 5 Files

### General Comments

#### User Group

#### Comment

#### Comment Date

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)