

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402519217

Receive Date:

10/27/2020

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>		Phone: <u>(303) 2969900</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>	Mobile: <u>(505) 3302593</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10638Initial 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 SMMost Sensitive Adjacent Land Use CTB LocationIs domestic water well within 1/4 mile? NoIs surface water within 1/4 mile? NoIs groundwater less than 20 feet below ground surface? No

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
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 over estimated. 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.
UPDATE 09/29/2020: Samples collected.

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 1

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)

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?

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.
We are estimating 222 cu ft of landfarmed soil. Will take two TPH & BTEX samples and a full Table 910-1 sample.
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UPDATE 09/29/2020: Samples collected. DRO/GRO exceed on East half of testing location. Will remove 6" of east side and test again. Currently, snow is 1 ft but anticipating melting soon. Will notify COGCC of testing date when set.

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.

UPDATE 09/29/2020: Samples collected. DRO/GRO exceed on East half of testing location. Will remove 6" of east side and test again. Currently, snow is 1 ft but anticipating melting soon. Will notify COGCC of testing date when set.

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.

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

_____ 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) _____ 50

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: _____

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.

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.

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UPDATE 09/29/2020: Samples collected. DRO/GRO exceed on East half of location. Will remove 6" of east side and test again. Currently, snow is 1 ft but anticipating melting soon. Will notify COGCC of testing date when set.

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. 09/29/2020

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 09/29/2020: Samples collected. DRO/GRO exceed on East half of testing location. Will remove 6" of east side and test again. Currently, snow is 1 ft but anticipating melting soon. Will notify COGCC of testing date when set.

Please see attached manifests for soil removal to landfill. See attached soil test results.

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

Submit Date: 10/27/2020

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: 10/27/2020

Remediation Project Number: 10638

COA Type**Description**

	All remaining soil shall comply with COGCC table 910-1.
	Operator should provide notice to Environmental staff, Kris Neidel (kris.neidel@state.co.us) or 970-846-5097 72 hrs prior to any sampling events or field activity related to this Remediation Project.

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**

402519217	FORM 27-SUPPLEMENTAL-SUBMITTED
402519252	SOIL SAMPLE LOCATION MAP
402519264	ANALYTICAL RESULTS
402519267	DISPOSAL MANIFESTS
402519268	DISPOSAL MANIFESTS

Total Attach: 5 Files

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

Environmental	COGCC staff, Kris Neidel was present at sampling that was described in this Form 27, see doc 694500239 for inspection details.	10/27/2020
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Total: 1 comment(s)