

State of Colorado
Oil and Gas Conservation Commission

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Report taken by:
RICK ALLISON

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: HIGHPOINT OPERATING CORPORATION	Operator No: 10071	Phone Numbers Phone: (303) 3128718 Mobile: (303) 5182290
Address: 555 17TH ST STE 3700		
City: DENVER	State: CO	Zip: 80202
Contact Person: Rusty Frishmuth	Email: rfrishmuth@hpres.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 15963 Initial Form 27 Document #: 402470718

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 checked="" 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: PIT	Facility ID: 119224	API #: _____	County Name: WELD
Facility Name: UPRC FEDERAL 23-1	Latitude: 40.826241	Longitude: -104.521828	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 23	Twp: 10N	Range: 64W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Willow Creek is located approximately 480 feet south-southwest of the pit. No other potential receptors identified.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input 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 checked="" type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	~1,400 square feet	Soil sampling.

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 August 31, 2020, WSP conducted soil sampling at the Site per the sampling plan submitted in COGCC Document # 402470718. No elevated PID readings, staining, or odor were observed on the sidewalls of the pit. Four samples (SS01@6' and SS03@6' through SS05@6') were collected from the sidewalls and one sample (SS02@8') was collected from the floor of the pit. All samples were delivered to Summit Scientific for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), total petroleum hydrocarbons (TPH) as gasoline range organics (GRO), and TPH as diesel range organics (DRO). The floor sample was also submitted for analysis of electrical conductivity (EC), sodium adsorption ratio (SAR), and pH. Additionally, four samples (PB01@0-18" through PB04@0-18") were collected from beneath the pit berm on each side of the pit. PB01@0-18" through PB04@0-18" were submitted for analysis of EC, pH, and SAR. Laboratory analytical results indicated that SS01@6' and SS02@8' exceeded the COGCC Table 910-1 standard for TPH with concentrations of 1,100 mg/kg and 523.9 mg/kg, respectively. EC and SAR in SS02@8' were also above the COGCC Table 910-1 standards with values of 5.08 millimhos per centimeter and 16.6, respectively. To investigate the potential lateral and vertical extent of the TPH impact identified in samples SS01@6' and SS02@8', on September 15, 2020, LTE advanced three borings to 10-foot bgs. Soil boring SB01 was located to delineate the western extent, soil boring SB02 was located delineate the downgradient extent, and SB03 was located at the center of the pit for vertical delineation. Soil was screened with a PID and for sensory evidence of staining and/or odor. No elevated PID readings or staining/odor was observed and two samples were collected from each boring. All samples were submitted to Summit for analysis of BTEX and TPH-GRO/DRO. Laboratory analytical results indicated that all samples were compliant with COGCC Table 910-1.

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):

On November 4, 2020, WSP was onsite to oversee excavation activities at the UPRC federal 23-1 evaporation pond to remove the TPH impact previously identified in SS01@6' and SS02@8'. Approximately 1.5-feet of overlying material was removed at the bottom of the evaporation pit where the previous TPH exceedance was identified in SS02@8'. Three confirmation samples (SS02@9.5', SS06@9.5', and SS07@9.5') were collected at the bottom of excavated area. Additionally, the west side of the pit was excavated to remove the previous TPH exceedance identified in sample SS01@6'. Approximately 1-foot of soil was removed from the west wall and two confirmation samples (SS01@7' and SS08@7') were collected. All samples collected were placed into laboratory provided jars then placed on ice, then were submitted to Summit for analysis of BTEX and TPHGRO/DRO/ORO. Laboratory analytical results indicated that all samples were compliant with COGCC Table 910-1.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Groundwater was not encountered.

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 20

Number of soil samples exceeding 910-1 2

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

Approximate areal extent (square feet) 1400

NA / ND

-- Highest concentration of TPH (mg/kg) 1100

-- Highest concentration of SAR 16.6

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 0

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?

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 was conducted to remove the TPH impact identified in samples SS01 @6' and SS02@8'. Confirmation soil samples verified that the impact was adequately removed. The pit will be backfilled and recontoured to match the surrounding natural grade. Any remaining inorganic impacts (EC and SAR in SS02@8') will be buried under at least 3 feet of clean fill. All excavated material was transported offsite to a properly permitted facility for final disposal.

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.

see above

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) _____ 120
- _____ 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 One time

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other Source Removal Excavation Summary

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 120

E&P waste (solid) description hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Waste Management N. Colorado
Landfill, Ault, CO

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? Yes

Do all soils meet Table 910-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? No

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? Yes

Is additional groundwater monitoring to be conducted? No

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.

Site has been reclaimed in accordance with COGCC 1000 series rules. Site regraded and seeded in November of 2020

Is the described reclamation complete? Yes

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). 08/31/2020

Date of commencement of Site Investigation. 08/31/2020

Date of completion of Site Investigation. 09/15/2020

REMEDIAL ACTION DATES

Date of commencement of Remediation. 10/19/2020

Date of completion of Remediation. 11/04/2020

SITE RECLAMATION DATES

Date of commencement of Reclamation. 11/09/2020

Date of completion of Reclamation. 11/25/2020

OPERATOR COMMENT

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

Signed: ` Rusty Frishmuth _____

Title: EHS Director _____

Submit Date: ` 12/04/2020 _____

Email: rfrishmuth@hpres.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: RICK ALLISON _____

Date: 12/29/2020 _____

Remediation Project Number: 15963 _____

COA Type**Description**

	<p>Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.</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**

402539176	FORM 27-SUPPLEMENTAL-SUBMITTED
402540921	ANALYTICAL RESULTS
402540922	ANALYTICAL RESULTS
402540923	ANALYTICAL RESULTS
402540925	SITE MAP
402540926	ANALYTICAL RESULTS

Total Attach: 6 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)