

State of Colorado
Oil and Gas Conservation Commission

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402590182
Receive Date:
03/02/2021

Report taken by:
Jason Kosola

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>EVERGREEN NATURAL RESOURCES LLC</u>	Operator No: <u>10705</u>	Phone Numbers
Address: <u>1875 LAWRENCE ST STE 1150</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Stacey Wiseman</u>	Email: <u>Stacey.Wiseman@enrllc.com</u>	Phone: <u>(719) 845-4619</u>
		Mobile: <u>(719) 680-1807</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 16175 Initial Form 27 Document #: 402553214

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: <u>LOCATION</u>	Facility ID: <u>333736</u>	API #: _____	County Name: <u>LAS ANIMAS</u>
Facility Name: <u>DROWSEY DUCK-633S66W 30NESE</u>	Latitude: <u>37.141523</u>	Longitude: <u>-104.815067</u>	
	** correct Lat/Long if needed: Latitude: <u>37.138875</u>	Longitude: <u>-104.813810</u>	
QtrQtr: <u>NESE</u>	Sec: <u>30</u>	Twp: <u>33S</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Soil Classificaiton - Lorencito - Rombo - Sarcillo complex 25 to 65 percent slopes

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

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 checked="" 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 type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Unknown at this time.	Will be determined by soil sampling
UNDETERMINED	VEGETATION	Unknown at this time.	Visual Inspection of Area by COGCC

INITIAL ACTION SUMMARY

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

Once results are received from soil samples collected, impact can be evaluated and a remediation plan designed as needed.

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):

This Form 27 Site Investigation is in response to Inspection Doc #700600237, which will investigate the source of vegetation die off area in the vicinity of the facilities referred to herein. The plan will include soil sampling for table 910-1 Inorganics in Soils constituents. One background and 10 discrete soil samples at depths up to 18 inches deep will be 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 10
Number of soil samples exceeding 910-1 3
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 10817
0

NA / ND

-- Highest concentration of TPH (mg/kg) 260
-- Highest concentration of SAR 1.5
 BTEX > 910-1 No
 Vertical Extent > 910-1 (in feet) 1

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?

One background soil sample will be collected to satisfy requirements of corrective actions associated with Doc# 700600237.

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.

Once results are received from soil samples collected, impact can be evaluated and a remediation plan designed as needed.

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.

Once results are received from soil samples collected, impact can be evaluated and a remediation plan designed as needed.

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.

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? 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? _____

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.

Once results are received, impact can be evaluated and a plan designed as needed.

Is the described reclamation complete? _____

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). 12/15/2020

Date of commencement of Site Investigation. _____

Date of completion of Site Investigation. _____

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

Per COA related to Document #402553214, attached are analytical results and 910-1 Table comparison for your review along with site map indicating location of samples taken. The samples were taken at varying depths between 6" and 12". Also attached, per Section 614(b) of the Rules and Regulations of the Colorado Oil and Gas Conservation Commission is letter from Landowner denying access for the requested gas survey.

There was a verbal conversation held with the landowner, Bernard Parsons, and Chris Sanchez, Ryan Coberly, Rodney Kunze and Stacey Wiseman, from ENR, on January 13, 2021, regarding permission to access his property to survey the area of vegetative die off adjacent to the Drowsey Duck 43-30 location as a result of an inspection on the location by the COCCC. At that time, it was explained to Mr. Parsons that COGCC was requesting a soil gas survey which would be in addition to the initial soil samples taken at the time of the inspection. Mr. Parsons responded that "the area has been there for a long time" and he would review the letter request sent by Evergreen and respond. See attached letter denying access.

The facilities, wells and pipelines, surrounding the Drowsey Duck 43-30 location were researched at the time of the inspection on the Drowsey Duck. None of the wells around the Drowsey Duck 43-30 location are subject to MIT testing because of their current status, either producing or PAd. A successful bradenhead test Below is a summary:

Glitter 22-30 – producing

Louis 41-30 – producing

Maverick 12-29 Org & Tr – PAd Status Date 03/08/2008 and 03/18/2008

Pueblo 32-29 Tr – producing

Pueblo 32-29 – producing

Pumpnickel 14-29 KV – producing

Pumpnickel 14-29 – Shut In Status 05/01/2019

Heartbeat 44-30 – producing

Heartbeat 44-30 Tr – producing

Clock 33-30 – producing

Foggy Day 23-30 – producing

Additionally, at the time of receipt of the Drowsey Duck inspection, a bradenhead test was conducted on the Heartbeat 43-30 and Drowsey Duck 43-30 and both showed 0 psi. LDS leak detection as also performed on the gathering lines in the area.

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

Signed: Stacey Wiseman

Title: Environmental

Submit Date: 03/02/2021

Email: Stacey.Wiseman@enrllc.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: Jason Kosola

Date: 03/23/2021

Remediation Project Number: 16175

COA Type

Description

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

Att Doc Num	Name
2100170	Analytical Summary Table
402590182	FORM 27-SUPPLEMENTAL-SUBMITTED
402590183	ANALYTICAL RESULTS
402590191	ANALYTICAL RESULTS
402596473	MAP
402614204	CORRESPONDENCE

Total Attach: 6 Files

General Comments

User Group

Comment

Comment Date

User Group	Comment	Comment Date
Environmental	Analytical results from soil sampling does not suggest impact from produced water. Landowner has denied access to area for soil gas sampling investigation. As a result this remediation will be closed.	03/23/2021
Environmental	Added operator statement on landowner contact.	03/23/2021
Environmental	Attached corrected summary table.	03/16/2021
Environmental	Units on summary table don't match. Contacted operator to correct table.	03/05/2021
Environmental	Returned to DRAFT. -No sample location map attached. -Site Investigation Report tab needs to be completed. -Soil gas survey required in previous COA on approved Form 27 is not mentioned in this report.	02/10/2021

Total: 5 comment(s)