

State of Colorado Oil and Gas Conservation Commission

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402674693

Receive Date:

04/29/2021

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: <u>GREAT WESTERN OPERATING COMPANY LLC</u>	Operator No: <u>10110</u>	Phone Numbers
Address: <u>1001 17TH STREET #2000</u>		Phone: <u>(720) 595-2132</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Jason Davidson</u>	Email: <u>j davidson@gwp.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15435 Initial Form 27 Document #: 402372025

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>TANK BATTERY</u>	Facility ID: <u>441861</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Pierce Unit Central Tank Battery</u>		Latitude: <u>40.643635</u>	Longitude: <u>-104.756987</u>
<u>441861</u>			
** correct Lat/Long if needed: Latitude: <u>40.643836</u>		Longitude: <u>-104.757313</u>	
QtrQtr: <u>SESE</u>	Sec: <u>22</u>	Twp: <u>8N</u>	Range: <u>66W</u>
Meridian: <u>6</u>		Sensitive Area? <u>Yes</u>	

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Agricultural

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? No

Other Potential Receptors within 1/4 mile

Pierce Lateral in place 75 feet to the northwest. Rural residential development in place across US HWY 85, 1,000 feet to the east. Rural residential property in place 1,100 feet to the southwest

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 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
Yes	SOILS	65' x 100' x various depths	Site Investigations and Excavation

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 2/20/20, a triplex pump froze, and the overflow alarm malfunctioned on two produced water tanks, resulting in the release of ~15 bbls of oil and 250 bbls of water. All but ~3 bbls were contained within the unlined, earthen berm secondary containment. The entire release was contained on location. Between 2/20/20 and 2/21/20, hydrovac equipment was used to remove four loads of standing liquids and impacted roadbase from the release area. Between 2/21/20 and 2/22/20, a backhoe was used to excavate an additional 140 cubic yards of impacted roadbase and soil from the release area. The impacted material was manifested and hauled offsite for proper disposal. On 2/25/20, a pothole investigation was conducted using a hydrovac to determine vertical and horizontal extent of hydrocarbon-impacted soils at the Site. 32 potholes were excavated in the release area to depths ranging from 12 to 48 inches below ground surface (bgs). Initial visual and olfactory observations and PID readings indicated the presence of potential hydrocarbon-impacts in the natural clay soil beneath the roadbase. Potential impacts were also observed in the flow path to the south and west of the southeast corner of the secondary containment where liquids had breached the earthen berm. No soil samples were submitted for laboratory analysis during the pothole investigation and groundwater was not encountered. On 4/23/20, Fremont Environmental conducted a hand auger investigation to delineate the vertical and horizontal extent of hydrocarbon-impacted soil at the release area. Eleven soil borings were advanced across the Site to depths ranging from 4 to 7 feet bgs. Based on field observations, 20 characterization soil samples were collected for laboratory analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), Total Petroleum Hydrocarbons (TPH)- Gasoline Range Organics (GRO) and TPH- Diesel Range Organics (DRO). Groundwater was not encountered during this investigation.

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 Fremont Environmental Excavation Report submitted with the COGCC approved Supplemental Form 27 Document Number 402487841 for a summary of soil sampling activities at the Site.

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 0

Number of soil samples exceeding 910-1

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

Approximate areal extent (square feet) 6500

NA / ND

NA Highest concentration of TPH (mg/kg)

NA Highest concentration of SAR

BTEX > 910-1 Yes

Vertical Extent > 910-1 (in feet) 24

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) 1232

Volume of liquid waste (barrels) 0

☐ 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.

Please refer to the Fremont Environmental Excavation Report submitted with the COGCC approved Supplemental Form 27 Document Number 402487841 and to the Fremont Environmental Remediation System Installation Report submitted with the COGCC approved Supplemental Form 27 Document Number 402583180 for a summary of source removal activities at the Site.

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.

Please refer to the Fremont Environmental Remediation System Installation Report submitted with the COGCC approved Supplemental Form 27 Document Number 402583180 for a summary of the remediation activities at the Site.

Soil Remediation Summary

☒ In Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
Yes _____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

☒ Ex Situ

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 1232
_____ 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.

Great Western is not required to monitor groundwater at the Site.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: ☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Report Type: ☐ Groundwater Monitoring ☐ Land Treatment Progress Report ☐ O&M Report

☒ Other Remediation Progress Report _____

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 1232

E&P waste (solid) description Hydrocarbon-impacted roadbase and soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Waste Management's North Weld Landfill in 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: _____

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? _____

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. 02/20/2020

Actual Spill or Release date, if known. 02/20/2020

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/20/2020

Date of commencement of Site Investigation. 02/25/2020

Date of completion of Site Investigation. 04/23/2020

REMEDIAL ACTION DATES

Date of commencement of Remediation. 12/07/2020

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

On 2/17/21, Great Western submitted an Air Permit Emission Notice (APEN) and Application for Construction Permit to the Colorado Department of Public Health and Environment (CDPHE) – Air Pollution Control Division (APCD) for the SVE and Falco 300 electric catalytic oxidizer (Catox) manufactured by Falmouth Products of Falmouth, MA. On 4/21/21, the CDPHE-APCD approved Construction Permit #21WE0105. Between 2/10/21 and 3/9/21 Fremont Environmental installed and electrified the Catox and on 4/26/21 the SVE system was restarted.

Please refer to the attached Figure 2 for an illustration of the proposed post-remediation confirmation soil sampling locations. Two samples from each boring will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene and GRO [C6-C10] by EPA Method 8260 and for DRO [C10-C28] and Residual Range Organics (RRO) [C28-C40] by EPA Method 8015. Analytical results for GRO, DRO, and RRO will be added together to calculate TPH. Following the receipt of post-remediation confirmation soil sample analytical results below Table 915-1 Residential Soil Screening Level concentrations, Great Western will request closure of Remediation Project #15435.

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: ` 04/29/2021

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: RICK ALLISON

Date: 05/04/2021

Remediation Project Number: 15435

Condition of Approval**COA Type****Description**

	Operator will analyze soil confirmation samples for the Table 915-1 Organics in Soil. Operator will provide additional information regarding site specific depth to groundwater to justify use of the Residential Soil Screening Levels as remediation goals.
1 COA	

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**

402674693	FORM 27-SUPPLEMENTAL-SUBMITTED
402674730	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)