

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

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: BERRY PETROLEUM COMPANY LLC	Operator No: 10091	Phone Numbers
Address: 11117 RIVER RUN BLVD		Phone: (661) 616-3941
City: BAKERSFIELD	State: CA	Zip: 93311
Contact Person: Jon Armstrong	Email: jarmstrong@bry.com	Mobile: (661) 203-4205

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 10044 Initial Form 27 Document #: 401201593

PURPOSE INFORMATION

- ☐ Rule 913.c.(1): Pit or Cuttings Trench closure.
- ☐ Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- ☐ Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- ☐ Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- ☐ Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- ☐ Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- ☐ Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- ☐ Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- ☐ Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- ☐ Rule 913.g: Changes of Operator.
- ☐ Rule 915.b: Request to leave elevated inorganics in situ.
- ☒ Other: Closure

SITE INFORMATION

No Multiple Facilities

Facility Type: LAND APPLICATION SITE	Facility ID: 443326	API #:	County Name: GARFIELD
Facility Name: Berry F01 697	Latitude: 39.556007	Longitude: -108.170705	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SENW	Sec: 1	Twp: 6S	Range: 97W
Meridian: 6	Sensitive Area?	Yes	

SITE CONDITIONS

General soil type - USCS Classifications ML

Most Sensitive Adjacent Land Use Grazing

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

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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	Confined to berm area for treatment	Visual inspection

INITIAL ACTION SUMMARY

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

Approximately 4,720 cubic yards of spoil material that is being treated on site by land farming is remnants from drilling and completion operations. The landfarming operations have taken place since the summer of 2012. The landfarming material was spread out on location to a depth of approximately 18" on Nov. 16, 2016. Samples taken since September 24, 2012 report that this material fails COGCC Table 910-1 for benzo(a)pyrene at various levels (0.024 – 0.9). TPH levels from composite and discrete sampling did not exceed the COGCC Table 910-1 standards at any time on this location.

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):

Phase I - Samples to be taken semi-annually (twice a year, in summer and fall). Composite sample will be taken from 8 locations on the spoil pile in early summer and analyzed. If composite sample passes, discrete samples will be taken to confirm the composite samples. If discrete samples pass, spoils will be buried per COGCC rules and interim reclamation of the pad will take place. If discrete samples fail, landfarming will continue. If composite sample fails, landfarming will continue. Phase II - Composite sample will be taken from 8 locations on the spoil pile in late fall and analyzed. Procedure will be the same as Phase I.

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 915-1 0

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

Approximate areal extent (square feet) 11000
0

NA / ND

-- Highest concentration of TPH (mg/kg) 151.4
41

-- Highest concentration of SAR 2.85

BTEX > 915-1 No

Vertical Extent > 915-1 (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 915-1

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 915-1

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.

In 2017, the landfarmed materials were spread out even more to approximate average depth of 18". To date, this material has been tilled two times. Per Dave Nicholson's recommendation based on the pre-treatment lab report on soil nutrients, 200 lbs. of nitrogen fertilizer and fulvic acid will be applied to future treatments.

REMEDICATION 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.

Spoil will be turned over by a Kubota farm tractor 8 to 10 times (depending on weather and snow conditions) during the warm months in 2017. The soil will be turned over with the frequency established in the plan as a minimum or with a higher frequency if possible. The soil has been spread out to increase exposure to the atmosphere and sunlight as much as possible on the production pad.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

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

☐ No Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____
Name of Licensed Disposal Facility or COGCC Facility ID # _____
☐ Yes Excavate and onsite remediation
☐ Yes Land Treatment
☐ No Bioremediation (or enhanced bioremediation)
☐ No Chemical oxidation
☐ No Other _____

Groundwater Remediation Summary

☐ No Bioremediation (or enhanced bioremediation)
☐ No Chemical oxidation
☐ No Air sparge / Soil vapor extraction
☐ No Natural Attenuation
☐ No 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

Approved Reporting Schedule:

☐ Quarterly

☐ Semi-Annually

☐ Annually

☒ Other Monthly

☐ **Request Alternative Reporting Schedule:**

☐ Semi-Annually

☐ Annually

☐ Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

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? Yes

If YES:

☒ Compliant with Rule 913.h.(1).

☐ Compliant with Rule 913.h.(2).

☐ Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted? No

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

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.

Pit will be backfilled with treated spoils, pit excess spoils and pad excess spoils for closure. Pad slopes will be reclaimed not to exceed 3:1 slope. Horizontal ripping, stair-stepping, grooving, tracking, or pocketing methods will be utilized on slopes to reduce erosion. Surface roughening shall be utilized on all areas receiving revegetation. Topsoil will be spread over all areas to be revegetated. These areas are identified on the attached drawing. Seed applied by drill will be covered by weed-free straw, mulched and crimped. Seed applied by hydroseeding will be tackified. A copy of the seed mix is attached. Monthly inspections for physical signs of compaction alleviation will be conducted by a qualified inspector while conducting stormwater inspections except when the location is in winter exclusion status. The location will be inspected during the growing season by a qualified contractor capable of identifying noxious weeds and selecting and applying the appropriate chemical to eradicate those noxious weeds.

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 provide the seed mix? Yes

If YES, does the seed mix comply with local soil conservation district recommendations? Yes

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 07/01/2009

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/08/2009

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/17/2009

Proposed date of completion of Remediation. _____

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

☐ Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

Berry submits the attached final landfarm sampling report for the F01. The sampling shows the material passes all 915-1 standards except for Arsenic which is in line with background concentrations shown in the report submitted to the COGCC by Berry in 2014. Since the material passes all 915-1 standards Berry is requesting to use the material on location as part of its reclamation efforts.

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

Signed: Jon Armstrong

Title: R&E Engineer II

Submit Date:

Email: jarmstrong@bry.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:

Date:

Remediation Project Number: 10044

COA Type**Description**

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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**

402709292	ANALYTICAL RESULTS
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Total Attach: 1 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)