

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
402730723
Receive Date:
06/30/2021
Report taken by:
CHRIS CANFIELD

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16282 Initial Form 27 Document #: 402577241

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: _____

SITE INFORMATION

No Multiple Facilities

Facility Type: LOCATION	Facility ID: 320309	API #: _____	County Name: ADAMS
Facility Name: EHLER-61S68W 11SWSE	Latitude: 39.973703	Longitude: -104.965775	
	** correct Lat/Long if needed: Latitude: 39.973960	Longitude: -104.965876	
QtrQtr: SWSE	Sec: 11	Twp: 1S	Range: 68W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Agricultural and open space
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? Yes

Other Potential Receptors within 1/4 mile

The Ehler 34-11 #1 oil and facility and the Ehler 34-11 #1 wellhead lie within the Aquatic Native Species Conservation Waters High Priority Habitat. The wellhead lies within the FEMA 100-year floodplain, but the facility does not. Big Dry Creek in place approximately 185 feet to the east. There were no additional sensitive areas or wildlife habitats identified within a quarter mile of the facility.

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	GROUNDWATER	Not impacted	Confirmation Groundwater Sampling
Yes	SOILS	Excavated	Confirmation 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.

Great Western proposes to conduct closure of the Ehler 34-11 #1 oil and gas facility in accordance with COGCC 900 Series Rules. Partially buried vessel removal activities, tank battery closure activities, and flowline removal activities are planned to commence on 1/20/2021 and be completed on 1/25/2021. Plugging and abandonment of the Ehler 34-11 #1 well is planned to commence in February 2021. Great Western will conduct field screening and confirmation soil sampling activities during closure of the facility between 1/20/2021 and 1/25/2021. Discreet soil and groundwater samples will be collected and analyzed pursuant to Rule 915, following the general sample collection guidance in Rule 915.e.(2) and Rule 915.e.(3). All waste generated during the closure activities will be managed and disposed of at Waste Connections in accordance with Rules 905 and 906. See the attached Figure 1 for an illustration of the location of the Site.

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):

At least fourteen discreet soil samples will be collected for field screening and at least five discreet soil samples will be collected for laboratory analysis. Soil samples will be analyzed for benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, and Total Volatile Petroleum Hydrocarbons (TVPH [C6-C10]) by EPA Method 8260 and Total Extractable Petroleum Hydrocarbons (TEPH [C10-C36]) by EPA Method 8015. Analytical results for TVPH and TEPH will be added together to calculate Total Petroleum Hydrocarbons (TPH). In addition, the soil sample from the base of the partially buried produced water vessel will be analyzed for the Soil Suitability for Reclamation parameters; Electrical Conductivity (EC), Sodium Absorption Ratio (SAR), and pH by Saturated Paste Method, and boron by Hot Water Soluble Soil Extract Method. See the attached Figure 2 for an illustration of the Site layout and proposed discreet soil sample locations for field screening and for laboratory analysis.

Proposed Groundwater Sampling

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

At least 3 groundwater samples will be collected for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260. See the attached Figure 2 for an illustration of the Site layout and proposed groundwater sample locations.

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 17
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1980

NA / ND

-- Highest concentration of TPH (mg/kg) 3363
-- Highest concentration of SAR 5.18
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 3
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 7
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l) _____
-- Highest concentration of Toluene (µg/l) 1.2
ND Highest concentration of Ethylbenzene (µg/l) _____
-- Highest concentration of Xylene (µg/l) 15
NA Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
0 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?

Please refer to the attached Facility Closure Report.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 1116 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 attached Facility Closure Report. Copies of the waste manifests are attached.

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 attached Facility Closure Report.

Soil Remediation Summary

In Situ

Yes Bioremediation (or enhanced bioremediation)

Ex Situ

Yes Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

If Yes: Estimated Volume (Cubic Yards) _____ 1116
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

Yes _____ 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.

Please refer to the attached Facility Closure Report.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____ 1116

E&P waste (solid) description Hydrocarbon impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Various. Please refer to the attached Facility Closure Report.

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? 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.

GWOC has conducted final reclamation of the land and soil affected by the facility in accordance with COGCC 1000-Series Rules. All disturbed areas have been reclaimed as nearly as practical to their original condition and all excavations have been backfilled. All areas compacted by oil and gas operations will be cross-ripped. GWOC will apply topsoil and compost and adequately till the land to re-establish a proper seedbed, stabilized to minimize erosion, and is scheduled to be reseeded with a landowner approved, native dryland pasture mix during the Fall of 2021.

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? No _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 04/05/2021

Proposed date of completion of Reclamation. 10/15/2021

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/20/2021

Proposed site investigation commencement. 03/17/2021

Proposed completion of site investigation. 04/05/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/18/2021

Proposed date of completion of Remediation. 04/05/2021

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

Great Western is the surface owner.

Site investigation, field screening, and confirmation soil sampling at the Ehler 34-11 #1 wellhead conducted during facility closure activities on March 18, 2021 confirmed that the 4 bbl fresh water release that occurred during P&A of the well on March 6, 2021 (Form 19 Document #402621863 attached in the Related Forms Tab of this Form 27) had been sufficiently remediated on the same day during clean-up with hydrovac equipment.

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: 06/30/2021

Email: j davidson@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: CHRIS CANFIELD

Date: 07/08/2021

Remediation Project Number: 16282

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

	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.
	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
2 COAs	

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**

402730723	FORM 27-SUPPLEMENTAL-SUBMITTED
402730746	DISPOSAL MANIFESTS
402730747	DISPOSAL MANIFESTS
402730748	DISPOSAL MANIFESTS
402730749	DISPOSAL MANIFESTS
402730751	DISPOSAL MANIFESTS
402730752	DISPOSAL MANIFESTS
402733569	REMEDIATION PROGRESS REPORT

Total Attach: 8 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)