

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

07/07/2021

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.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>P O & G OPERATING LLC</u>	Operator No: <u>10634</u>	Phone Numbers
Address: <u>5847 SAN FELIPE SUITE 3200</u>		Phone: <u>(812) 6384077</u>
City: <u>HOUSTON</u> State: <u>TX</u> Zip: <u>77057</u>		Mobile: <u>(405) 6930955</u>
Contact Person: <u>Matt Wikowsky</u>	Email: <u>matt_wikowsky@pogresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16019 Initial Form 27 Document #: 402501308

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

Yes Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>324938</u>	API #: _____	County Name: <u>KIT CARSON</u>
Facility Name: <u>LOWE-611S46W 14NWNE</u>	Latitude: <u>39.097350</u>	Longitude: <u>-102.528140</u>	
** correct Lat/Long if needed: Latitude: <u>39.098743</u>		Longitude: <u>-102.521557</u>	
QtrQtr: <u>NWNE</u>	Sec: <u>14</u>	Twp: <u>11S</u>	Range: <u>46W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>463250</u>	API #: _____	County Name: _____
Facility Name: _____	Latitude: _____	Longitude: _____	
** correct Lat/Long if needed: Latitude: <u>39.098743</u>		Longitude: <u>-102.521557</u>	
QtrQtr: _____	Sec: _____	Twp: _____	Range: _____ Meridian: _____ Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Rangeland

Is domestic water well within 1/4 mile? No

Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Depth to groundwater is unknown

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
Yes	SOILS	See Attached Data	Soil Samples/Lab Analysis

INITIAL ACTION SUMMARY

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

Site inspection conducted after Plug & Abandon operations. It was discovered that the catchpan underneath the load line leaked and stained soils were observed on location. Equipment has been removed. Soil samples were obtained.

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 October 23, 2019, Four (4) soil samples were taken and tested. PLTB-1, PLTB-2 exceeded the TPH COGCC standard 500 mg/kg. PLTB-4 exceeded the PH COGCC standard of 6-9 mg/kg

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 4
Number of soil samples exceeding 915-1 3
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 0

NA / ND

-- Highest concentration of TPH (mg/kg) 69900
NA Highest concentration of SAR
BTEX > 915-1 No
Vertical Extent > 915-1 (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 915-1 0

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
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?

☐ 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.

As the laboratory analytical results showed, soil samples exceeded the compliance with COGCC standards for samples PLTB-1; PLTB-2; PLTB-4. PO&G proposes to conduct an in-situ bioremediation of the impacted soil for TPH and not remove any soil.

REMEDIAL ACTION 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.

As all samples are in compliance with COGCC table 910-1 allowable limits except for PLTB-1 & PLTB-2 TVPH & TEPH; PLTB-4 PH. PO&G proposes to conduct an in-situ bioremediation of the impacted soil. By utilizing the soils natural properties along with applying Revive O to help speed up the process, that the high value of the TEPH, TVPH, PH will be able to drop below the allowable concentration of 500 mg/kg and 6-9 mg/kg given enough time. Revive O is a biodegradable dispersant that does not contain bacteria, but rather changes the wettability allowing the hydrocarbons to be broken down easier. The plan is to aerate the soil and apply Revive O after given approval from the COGCC. PO&G proposes that the affected areas be tested every 6 months to check the status of the remediation.

Soil Remediation Summary

☒ In Situ

Yes _____ 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

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

☐ **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? No

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?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

Is additional groundwater monitoring to be conducted?

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.

As all samples are in compliance with COGCC table 910-1 allowable limits except for PLTB-1 & PLTB-2 TVPH & TEPH; PLTB-4 PH. PO&G proposes to conduct an in-situ bioremediation of the impacted soil. By utilizing the soils natural properties along with applying Revive O to help speed up the process, that the high value of the TEPH, TVPH, PH will be able to drop below the allowable concentration of 500 mg/kg and 6-9 mg/kg given enough time. Revive O is a biodegradable dispersant that does not contain bacteria, but rather changes the wettability allowing the hydrocarbons to be broken down easier. The plan is to aerate the soil and apply Revive O after given approval from the COGCC. PO&G proposes that the affected areas be tested every 6 months to check the status of the remediation.

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? _____

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

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. _____

Actual Spill or Release date, or date of discovery. 09/05/2019

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/24/2019

Proposed site investigation commencement. 10/23/2019

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

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

06/10/2021 Update: As all samples are in compliance with COGCC table 915-1 allowable limits, P.O.&G. Operating proposes to discontinue treating the area with Revive-O and will no longer test the soil or TPH contaminants. P.O.&G. will seed the site in the Spring of 2022 and report the condition of vegetation growth in the fall of 2022.

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

Signed: Wendy Colotta

Title: Regulatory Analyst

Submit Date: 07/07/2021

Email: wendy_colotta@pogresources.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: 08/03/2021

Remediation Project Number: 16019

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

	Attached raw analytical results are for the Lowe B2 location and not this location. Deleted incorrect attachment. Operator shall submit additional Form 27 Subsequent with correct raw analytical results.
	Request for discontinuing sampling is denied. Operator was informed via email on 6/14/2021 of requirement to sample soil at the same depths as the initial sampling but failed to correct this with submission of this form. Operator shall conduct soil sampling as described below and submit on a Form 27 Subsequent no later than September 30, 2021 Operator shall conduct all soil sampling in the same manner as the initial round of sampling. Soil shall be sampled at the same location and depth of the initial round of sampling. Operator will collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document.
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**

402714872	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

Environmental	Deleted incorrect attachment table. No raw analytical results attached.	06/14/2021
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Total: 1 comment(s)