

# 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:

402769818

Receive Date:

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.

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

### OPERATOR INFORMATION

Name of Operator: <u>P O &amp; G OPERATING LLC</u>	Operator No: <u>10634</u>	<b>Phone Numbers</b>
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:**

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input 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	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) 0

Number of groundwater monitoring wells installed 0

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.

## REMEDATION 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

☐ 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**

Per emails with Jason Kosla - Copy of the Analytical Report and chart are attached. Soil samples will be taken again in accordance with the original remediation plan that was approved, no deeper than 6".

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:

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:

Date:

Remediation Project Number: 16019

**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**

402769964	ANALYTICAL RESULTS
402769967	ANALYTICAL RESULTS

Total Attach: 2 Files

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

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

Total: 0 comment(s)