

# State of Colorado Oil and Gas Conservation Commission

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402735977

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07/01/2021

Report taken by:

Jim Hughes

## 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: LOGOS OPERATING LLC	Operator No: 10679	<b>Phone Numbers</b> Phone: (505) 320-7954 Mobile: (505) 320-7954
Address: 2010 AFTON PLACE		
City: FARMINGTON	State: NM Zip: 87401	
Contact Person: DAWN HOWELL	Email: dhowell@logosresourcesllc.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 7313 Initial Form 27 Document #: 2230506

#### 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: 7/1/2021- WPX did not complete the following facility upgrade/remediation project submitted in 2012

#### SITE INFORMATION

No Multiple Facilities

Facility Type: PIT	Facility ID: 104922	API #: _____	County Name: LA PLATA
Facility Name: NWCH 32-10 4		Latitude: 37.015659	Longitude: -107.959320
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: NESW	Sec: 17	Twp: 32N	Range: 10W Meridian: N Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications SW Most Sensitive Adjacent Land Use RANGELAND

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? Yes

**Other Potential Receptors within 1/4 mile**

WATER WELL ~200 FT SOUTH.

**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	none	TBD - NOT LIKELY
No	SOILS	none	TBD - NOT ANTICIPATED
No	SURFACE WATER	none	TBD - NOT LIKELY
No	VEGETATION	none	N/A

**INITIAL ACTION SUMMARY**

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

7/1/2021- WPX did not complete the following remediation/facility upgrade project submitted in 2012. LOGOS Operating will complete the facility upgrade/remediation later when commodity prices have improved and/or when the well is plugged and abandon  
ASSESSMENT OF FORMER PIT ASSOCIATED WITH COGCC. CURRENTLY BURIED VESSEL IN PROXIMITY OF FORMER PIT. SOIL SAMPLING TO BE DONE AROUND PERIMETER OF TANK USING HAND AUGER OR SIMILAR SAMPLING METHOD TO +/-8 FEET BELOW GROUND SURFACE.

**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 ):**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 \_\_\_\_\_  
Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_  
Approximate areal extent (square feet) \_\_\_\_\_

### NA / ND

Highest concentration of TPH (mg/kg) \_\_\_\_\_  
Highest concentration of SAR \_\_\_\_\_  
BTEX > 915-1 \_\_\_\_\_  
Vertical Extent > 915-1 (in feet) \_\_\_\_\_

### 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.

7/1/2021- WPX did not complete the following remediation/facility upgrade project submitted in 2012. LOGOS Operating will complete the facility upgrade/remediation later when commodity prices have improved and/or when the well is plugged and abandon  
SUBMIT SOIL SAMPLES TO LAB FOR TABLE 910-1 ANALYSIS.

## 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.

7/1/2021- WPX did not complete the following remediation/facility upgrade project submitted in 2012. LOGOS Operating will complete the facility upgrade/remediation later when commodity prices have improved and/or when the well is plugged and abandon

## Soil Remediation Summary

☐ In Situ

\_\_\_\_\_ 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**

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ 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.

TBD. IF IMPACT IS IDENTIFIED IN LAB RESULTS OF SOIL SAMPLE A REVISED PLAN WILL BE SUBMITTED TO ADDRESS THE REQUIREMENTS.

## REMEDIATION PROGRESS UPDATE

## PERIODIC REPORTING

**Approved Reporting Schedule:**

☐ Quarterly☐ Semi-Annually☐ Annually☐ Other

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☐ **Request Alternative Reporting Schedule:**☐ Semi-Annually☐ Annually☒ Other

7/1/2021- WPX did not complete the following remediation/facility upgrade project submitted in 2012. LOGOS Operating will complete the facility upgrade/remediation later when commodity prices have improved and/or when the well is plugged and abandon.

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&amp;P waste (solid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

E&amp;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?

Does Groundwater meet Table 915-1 standards? Yes

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.

7/1/2021- WPX did not complete the following remediation/facility upgrade project submitted in 2012. LOGOS Operating will complete the facility upgrade/remediation later when commodity prices have improved and/or when the well is plugged and abandon  
TBD. NO SEEDING OR SURFACE RESTORATION PLANNED UNTIL SITE ABANDONMENT.

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? No

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

Did the local soil conservation district provide the seed mix? No

## 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.

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/01/2021

Proposed site investigation commencement.

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**

7/1/2021- WPX did not complete the following remediation/facility upgrade project submitted in 2012. LOGOS Operating will complete the facility upgrade/remediation later when commodity prices have improved and/or when the well is plugged and abandon

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

Signed: DAWN HOWELL

Title: Sr. Land Analyst

Submit Date: 07/01/2021

Email: dhowell@logosresourcesllc.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: Jim Hughes

Date: 08/10/2021

Remediation Project Number: 7313

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

	The operator will comply with the 900 and 1000 Series Rules upon commencement of the work described in this site investigation and remediation work plan.
	Per Rule 913.c, the operator will submit a Form 27 prior to modifying or removing the partially buried vessel currently on site.
	Remediation Project #7313 was initially created in anticipation of facility modifications which involved removing a partially buried vessel from the former pit area. The operator has not performed this facility modification and has requested closure of this remediation project. When it becomes apparent that the facility modifications are imminent, or the Oil and Gas Location is being decommissioned, a new remediation project work plan will be submitted. This remediation project is being administratively closed because this location is currently an active Oil and Gas facility and the partially buried vessel is still in use.
3 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**

402735977	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

Environmental	On the Remediation Completion Report tab, COGCC EPS staff made the following edits with the operator's verbal consent on 6/4/21. "Yes" was selected as the response to "Is this a Final Closure Request for this Remediation Project?", as well as the response to "Do all soils meet Table 915-1 standards", and "Does Groundwater meet Table 915-1 standards?" Site investigation will be conducted at the time of facility upgrades/modifications as required by Rule. The "Change from approved implementation schedule per Rule 913.d.(2)." box has also been unchecked.	08/10/2021
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Total: 1 comment(s)