

# State of Colorado Oil and Gas Conservation Commission

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



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402684376

Receive Date:

05/10/2021

Report taken by:

Steven Arauza

## 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: CAERUS PICEANCE LLC	Operator No: 10456	<b>Phone Numbers</b>
Address: 1001 17TH STREET #1600		
City: DENVER State: CO Zip: 80202		
Contact Person: Blair Rollins	Email: brollins@caerusoilandgas.com	
		Phone: (970) 285-2925
		Mobile: (970) 640-6919

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 16594

Initial Form 27 Document #: 402585991

#### PURPOSE INFORMATION

- |  |  |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination                                       | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water                   |
| <input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure                             | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input checked="" type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation                 | <input type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project                                  |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste                      | <input type="checkbox"/> Rule 906.c.: Director request   |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____   |

#### SITE INFORMATION

N Multiple Facilities ( in accordance with Rule 909.c. )

Facility Type: SPILL OR RELEASE	Facility ID: 478403	API #: _____	County Name: GARFIELD
Facility Name: N23 water transfer system	Latitude: 39.502900	Longitude: -108.187407	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: sesw	Sec: 23	Twp: 6S	Range: 97W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications GC

Most Sensitive Adjacent Land Use Non-cropland 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? No

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

An unnamed spring is located approximately 0.3 miles south of the spill location.

# 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	To be determined	Laboratory analytical results

## INITIAL ACTION SUMMARY

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

Please refer to COGCC Document Numbers 402519107 and 402525660 for this information.

## 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 ):

Caerus will determine the extent of contamination associated with the release by installation of soil borings within the area of the release, see proposed soil boring location map.

### Proposed Groundwater Sampling

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

In the event that groundwater is encountered, Caerus will attempt to collect a representative groundwater sample for COGCC Table 915-1 analysis.

### Proposed Surface Water Sampling

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

Caerus will continue to monitor the unnamed spring located approximately 0.3 miles south of the location. In the event that fluid is identified coming from the spring, Caerus will collect a representative sample for COGCC Table 915-1 analysis.

## 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 14

Number of soil samples exceeding 910-1 7

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 15000

### NA / ND

-- Highest concentration of TPH (mg/kg) 4733

-- Highest concentration of SAR 36

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 8

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 100'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA Highest concentration of Methane (mg/l)

### Surface Water

0 Number of surface water samples collected

0 Number of surface water samples exceeding 910-1

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?

Caerus utilized background soil samples from the Mesa 16 (COGCC Location ID 335519). Please refer to the tabulated data and lab report for this information.

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

Volume of solid waste (cubic yards) 48

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Caerus will determine the extent of contamination associated with the release by installation of soil borings within the area of the release, see proposed soil boring location map.

# 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.

Caerus will determine a path forward for removal of remaining impacts once delineation is complete.

## 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.

Caerus will determine a path forward for removal of remaining impacts once delineation is complete.

## Soil Remediation Summary

☒ In Situ

No Bioremediation ( or enhanced bioremediation )

No Chemical oxidation

No Air sparge / Soil vapor extraction

No Natural Attenuation

Yes Other To be determined

☐ 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.

In the event groundwater is encountered at the site and determined to be impacted, Caerus will prepare a remediation strategy for the site and provide this information to the COGCC under a Supplemental eForm 27.

## REMEDIATION PROGRESS UPDATE

### PERIODIC REPORTING

**Frequency:** ☐ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

**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? \_\_\_\_\_

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 \_\_\_\_\_

Do all soils meet Table 910-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? \_\_\_\_\_

Does Groundwater meet Table 910-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

## 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.

Caerus will return the well pad to the active working surface of the location for continued use.

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 approve the seed mix? Yes \_\_\_\_\_

If NO, does the seed mix comply with local soil conservation district recommendations? Yes \_\_\_\_\_

## IMPLEMENTATION SCHEDULE

### **PRIOR DATES**

Date of Surface Owner notification/consultation, if required. \_\_\_\_\_

Actual Spill or Release date, if known. \_\_\_\_\_

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). \_\_\_\_\_ 10/29/2020

Date of commencement of Site Investigation. \_\_\_\_\_ 06/07/2021

Date of completion of Site Investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Date of commencement of Remediation. \_\_\_\_\_

Date of completion of Remediation. \_\_\_\_\_

### **SITE RECLAMATION DATES**

Date of commencement of Reclamation. \_\_\_\_\_

Date of completion of Reclamation. \_\_\_\_\_

**OPERATOR COMMENT**

The proposed soil boring installation as outlined in the Initial eForm 27 (Doc #402585991) is scheduled to begin on June 7th, 2021. During soil boring installation, if hydrocarbon impacts are identified Caerus will convert the soil boring to a soil vapor extraction well using solid PVC and slotted PVC to allow for future remediation options at the location. Caerus will provide updated information to the COGCC following field investigation and sampling on a supplemental eForm 27 along with remediation options for COGCC review and approval.

Based on the laboratory analytical results outlined in COGCC Document #402586217 included on the Initial eForm 27 (COGCC Document #402585991), Caerus requests a modified analyte suite to include GRO, DRO, BTEX, EC, SAR, and pH. Per Rule 915.f., if remediation is not complete by January 15, 2022, Caerus will comply with COGCC Table 915-1.

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

Signed: Blair Rollins

Title: EHS Specialist

Submit Date: 05/10/2021

Email: brollins@caerusoilandgas.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: Steven Arauza

Date: 08/13/2021

Remediation Project Number: 16594

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

	Based on the analytical results provided for soil confirmation samples (doc #402586217), the Operator's request for a reduced analyte suite of TPH-GRO, TPH-DRO, BTEX, EC, SAR, and pH is conditionally approved.  If groundwater is encountered, the Operator shall comply with the complete Table 915-1 list using the Protection of Groundwater Soil Screening Level Concentrations.
1 COA	

**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**

402684376	FORM 27-SUPPLEMENTAL-SUBMITTED
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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)