

State of Colorado Oil and Gas Conservation Commission

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402761090

Receive Date:

07/27/2021

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.

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

OPERATOR INFORMATION

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18560 Initial Form 27 Document #: 402713247

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: SPILL OR RELEASE	Facility ID: 480103	API #: _____	County Name: GARFIELD
Facility Name: Texaco Fee 6214 Tank Overflow	Latitude: 39.534532	Longitude: -108.463857	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 17	Twp: 6S	Range: 99W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GM

Most Sensitive Adjacent Land Use Riparian area

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? No

Other Potential Receptors within 1/4 mile

The domestic water well is located approximately 2,350 feet south of the location. The surface water is located approximately 1,500 feet west of the 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 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.

Please refer to COGCC document number 402708407 for initial response measures for the project.

Additionally, Caerus moved the tank to assess the extent of contamination associated with the project. Following tank removal, Caerus excavated approximately 72 cubic yards of impacted soil for offsite disposal at Greenleaf Environmental Services outside of DeBeque, Colorado.

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):

Included as an attachment are the proposed soil boring locations to vertically and horizontally delineate the extent of contamination associated with the project. Soil investigation and sampling will be conducted on each soil boring in 5 (five) foot intervals to determine the extent of contamination associated with the project. Soil samples will be analyzed for COGCC Table 915-1 residential soil screening concentration levels for the project.

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 during the investigation and delineation phase of this project, 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):

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 50
Number of soil samples exceeding 915-1 26
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 900

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 350'
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 0

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.

NA / ND

-- Highest concentration of TPH (mg/kg) 34460
-- Highest concentration of SAR 15.6
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 22

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)

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

Background offsite native undisturbed soil samples were collected from around the well pad for comparison, please refer to the attached report of work completed.

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

Volume of solid waste (cubic yards) 72 Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Caerus is in the process of installing soil borings to delineate the vertical and horizontal extent of contamination associated with the project. Once delineation has been completed, Caerus will provide these results to the COGCC with plans for remediation of impacts associated with the spill.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Caerus is in the process of determining the feasibility for manual excavation of the impacts outlined in the attached report of work completed. If excavation of the impacts associated with this spill are conducted, Caerus will confirm compliance with COGCC Table 915-1 concentration levels through sampling and laboratory analysis. Additionally, Caerus would excavate the impacted soil and securely stage it on the location for characterization. Caerus will provide characterization sample results and final disposition of the excavated material for COGCC review.

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 is in the process of determining the feasibility for manual excavation of the impacts outlined in the attached report of work completed. If excavation of the impacts associated with this spill are conducted, Caerus will confirm compliance with COGCC Table 915-1 concentration levels through sampling and laboratory analysis. Additionally, Caerus would excavate the impacted soil and securely stage it on the location for characterization. Caerus will provide characterization sample results and final disposition of the excavated material for COGCC review.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

 Bioremediation (or enhanced bioremediation)

 Yes Excavate and offsite disposal

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

If Yes: Estimated Volume (Cubic Yards)

Name of Licensed Disposal Facility or COGCC Facility ID # _____

☐ Yes ☐ Excavate and onsite remediation

☐ No ☐ Land Treatment

☐ No ☐ Bioremediation (or enhanced bioremediation)

☐ No ☐ Chemical oxidation

☐ Yes ☐ Other ☐ Onsite staging and characterization _____

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.

Groundwater impacts have not been identified associated with this project. If future investigation activities identify impacts to groundwater, Caerus will submit supplemental documentation to provide scope and monitoring of impacted groundwater.

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:

Condensate impacted soil was excavated from the secondary containment area and transported to Greenleaf Environmental Services outside of DeBeque, Colorado for offsite disposal. No beneficial use of this material is proposed.

Volume of E&P Waste (solid) in cubic yards 72

E&P waste (solid) description Condensate impacted soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Offsite disposal at Greenleaf Environmental Services

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description N/A

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: N/A

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.

Caerus will follow COGCC 1000 series regulations for final site reclamation at the end of the life of the facility.

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. _____

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). _____

Proposed site investigation commencement. 06/08/2021

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

The point of release sample was collected from the ground surface immediately adjacent to the tank which overfilled causing the release. Approximately 72 cubic yards of surficially impacted soil was removed and disposed offsite at Greenleaf Environmental Services. Soil Boring 2 (SB2) sample results from 5 - 22 feet below ground surface represent the existing impacts at the location for remediation.

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: 07/27/2021

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: 08/16/2021

Remediation Project Number: 18560

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

	<p>In addition to Organic Compounds in Soil, the Operator shall address all documented exceedances for Table 915-1 Contaminants of Concern using the Residential Soil Screening Level Concentrations.</p> <p>This condition of approval does not constitute COGCC approval of a reduced analyte suite. Operator shall continue to analyze all soil samples for the complete Table 915-1 list, unless approval of a reduced analyte suite is explicitly requested and approved by the COGCC on a Supplemental Form 27, pursuant to Rule 915.e.(2).C.</p>
	<p>Attached report, doc #402761150, references arsenic concentrations for background samples collected from the Hollis 6207 Pad. Additional information is required for consideration of off-site background samples: Operator shall provide a Location ID and soil sample location map for the Hollis 6207 pad as well as a technical assessment of soil type and justification for consideration of these samples as reflective of background conditions in the site investigation area.</p>
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**

402761090	FORM 27-SUPPLEMENTAL-SUBMITTED
402761150	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

Environmental	Per outstanding COAs, submit a Form 19 to request closure of Spill/Release ID #480103.	08/16/2021
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Total: 1 comment(s)