

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402725856

Receive Date:

06/30/2021

Report taken by:

ALEX FISCHER

Site Investigation and Remediation Workplan (Initial 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>CM PRODUCTION LLC</u>	Operator No: <u>10352</u>	Phone Numbers
Address: <u>390 UNION BLVD SUITE 620</u>		Phone: <u>(970) 946 3761</u>
City: <u>LAKEWOOD</u>	State: <u>CO</u>	Zip: <u>80228</u>
Contact Person: <u>Jacob Harter</u>	Email: <u>jharter@cottonwoodconsulting.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 19690 Initial Form 27 Document #: 402725856

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: <u>WELL</u>	Facility ID: _____	API #: <u>057-06127</u>	County Name: <u>JACKSON</u>
Facility Name: <u>MARGARET SPAULDING (OWP) 18</u>	Latitude: <u>40.723245</u>	Longitude: <u>-106.501070</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>28</u>	Twp: <u>9N</u>	Range: <u>81W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications OL

Most Sensitive Adjacent Land Use Agriculture/Ranching and Rangeland

Is domestic water well within 1/4 mile? No

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

Irrigation ditches and other surface water resources located approximately 250 feet east and down gradient and 125 west feet and up gradient of the subject well site.

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
UNDETERMINED	GROUNDWATER	TBD	Field Screening and Analytical Results
UNDETERMINED	SOILS	TBD	Field Screening and 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.

The COGCC Orphan Well Program will be plugging the Margaret Spaulding (OWP) #18 well and decommissioning the associated flow lines and production equipment. Soil samples will be collected in accordance with COGCC Rule 915.e(2)B. Soil samples will be collected from the well head excavation, flow line path(s), as well as any other area likely to have been impacted. If groundwater is discovered during remediation activities, a water sample will be collected. Samples will be submitted for laboratory analysis of Table 915-1 constituents.

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):

Soil samples will be collected for laboratory analysis of Table 915-1 constituents from areas most likely to have been impacted. Visual inspection and field screening of soils will be conducted in the areas surrounding the well head, flow line, and production equipment (if present) on location. Based on these observations, discrete soil samples will be collected and submitted for laboratory analysis of Table 915-1 constituents. See attached map for proposed soil sampling locations.

Proposed Groundwater Sampling

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

If a pathway to groundwater is discovered or groundwater is encountered during remediation activities, a sample(s) will be collected and analyzed for Table 915-1 constituents.

Proposed Surface Water Sampling

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

No surface water sampling is anticipated at this time.

Additional Investigative Actions

☐ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Field personnel will perform a visual inspection of the site. If the presence of hydrocarbons is expected based on visual or olfactory observations, field personnel will field screen soils and evaluate hydrocarbon impacts in the field prior to sampling at each location.

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?

Background soil conditions will be determined by the analysis of a sample(s) collected from nearby, non-impacted native soil. Background sample(s) will be collected and analyzed for Table 915-1 constituents.

☐ 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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Initial site investigation will include field screening of soils near the wellhead, flow line path(s), and any other area likely to have been impacted using a PID and visual/olfactory observations. Additionally, discrete soil samples will be collected in these areas to profile any potential impacts. Depending on results from the initial site investigation, a remediation plan will be created to address site impacts and will be documented on a supplemental Form 27.

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.

Impacted material discovered during the scope of this work plan will be removed and disposed of as E&P waste at an approved facility. Any additional remediation activities will be documented on a supplemental Form 27.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 12
_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____ 0
_____ 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
_____ 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.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☒ Quarterly☐ Semi-Annually☐ Annually☐ Other

☐ Request Alternative Reporting Schedule:

☐ Semi-Annually☐ Annually☒ Other

Facility Closure

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?

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:

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.

Reclamation will be in accordance with COGCC 1000 Series Rules.

Is the described reclamation complete?

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

☐ Interim☐ FinalDid 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. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/01/2021

Proposed site investigation commencement. 07/15/2021

Proposed completion of site investigation. 09/30/2021

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

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

Signed: Jacob Harter

Title: Consultant

Submit Date: 06/30/2021

Email: jharter@cottonwoodconsulting.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: ALEX FISCHER

Date: 08/20/2021

Remediation Project Number: 19690

Condition of Approval

COA Type

Description

	No current Form 17 on file with COGCC. Comply with COAs Doc #402613112.
	Form 42 not found in well file for on-location flowline abandonment. Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements.
	A supplemental Form 27 will be submitted within 45 days of the completion of the actions described in this submission.
	Upon discovery of flowline release during the PA and removal, the operator must investigate the extent of release and provide form 19 and a supplemental form 27 with proposed investigation sample sites for COGCC staff approval.

	If groundwater is encountered during any excavation, a minimum of one surface/groundwater sample shall be collected per Rule 913.c.(6) for those constituents listed in Table 915-1.
	Discrete soil samples shall be collected and analyzed for Table 915-1 Cleanup Concentrations using the Protection of Groundwater Screening Level Concentrations.
	Form 44 Doc #402292652 does not provide information regarding the abandonment of the Off-Location flowline. Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements.
7 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**

402725856	FORM 27-INITIAL-SUBMITTED
402731989	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

General Comments

User Group **Comment** **Comment Date**

	Doc #2193076 WARNING LETTER #2193076	08/20/2021
	Inspection Doc #200878686 states, OIL SPILLS ON LKOC. Inspection Doc #200272783 states, POOLS OF OIL ON GROUND, REMEDIATE OILY SOIL AT PER RULES 909 AND 910 Inspection Doc #200272783 states, Stained soil at wellhead. and Doc #673403351 shows photos of stained soil. Inspection Doc #673403622 and Doc #673403623 shows photos of stained soil. Inspection Doc #694500151 and Doc #694500152 shows photos of stained soil and irrigation water running across the location.	08/20/2021

Total: 2 comment(s)