FORM 27 Rev 4/21

State of Colorado
Oil and Gas Conservation Commission

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Report taken by: Jason Kosola

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 INFORMATON

Name of Operator: GILBERT-STEWART OPERATING LLC Operator No: 34105
Address: 1801 BROADWAY STE 200
City: DENVER State: CO Zip: 80202
Contact Person: Kent Gilbert Email: kgoil@msn.com

Phone Numbers
Phone: (303) 478-8393
Mobile: (303) 478-8393

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16224 Initial Form 27 Document #: 402572626

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.
- [X] 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: LOCATION Facility ID: 475565 API #: County Name: CHEYENNE
Facility Name: YELTSIN-615S45W 1SWSE Latitude: 38.770553 Longitude: -102.390873
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SESE Sec: 1 Twp: 15S Range: 45W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications SM
Most Sensitive Adjacent Land Use Agriculture.
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

None identified.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [ ] Produced Water
  - [X] Oil
  - [ ] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	2,200 square feet	Soil samples and visual observation

INITIAL ACTION SUMMARY

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

See attached Remediaiton Summary.

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 **NA / ND**

Number of soil samples collected 12 -- Highest concentration of TPH (mg/kg) 6900

Number of soil samples exceeeding 915-1 12 -- Highest concentration of SAR 4.19

Was the areal and vertical extent of soil contamination delineated? Yes BTEX > 915-1 Yes

Approximate areal extent (square feet) 2200 Vertical Extent > 915-1 (in feet) 2

Groundwater

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? No Highest concentration of Toluene (µg/l)

Depth to groundwater (below ground surface, in feet) ` Highest concentration of Ethylbenzene (µg/l)

Number of groundwater monitoring wells installed Highest concentration of Xylene (µg/l)

Number of groundwater samples exceeding 915-1 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?

One background soil sample (BG01) was collected from an undisturbed area for the analysis of Arsenic on December 10, 2020.

☐ 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.

The identified impact was remediated onsite by land treatment within the tank battery's earthen berm containment. The earthen berm was maintained to contain impacted material and prevent runoff. The soil stockpile with identified TPH and arsenic impact was moved and placed in this treatment area. Further excavation/scraping from the soil stockpile's footprint was conducted, and that soil was added to the treatment area for remediation. The treatment area was mechanically turned, and manure was applied as a remedial amendment to aerate the impacted material, provide nutrients to enhance hydrocarbon biodegradation, and dilute inorganic constituents. When land treatment was initiated, soil samples were collected on 1-29-21 to delineate the vertical extent of impact in the treatment area. Soil samples of the impacted material that was being treated was collected on a semi-annual schedule (7-07-21). COGCC Table 915-1 standards were achieved, with the exception of arsenic.

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.

See attached Remediation Summary.

Soil Remediation Summary

☒ **In Situ** ☐ **Ex Situ**

Yes Bioremediation (or enhanced bioremediation) Excavate and offsite disposal

Chemical oxidation

Air sparge / Soil vapor extraction

Natural Attenuation

Yes Other mechanical mixing

If Yes: Estimated Volume (Cubic Yards)

Name of Licensed Disposal Facility or COGCC Facility ID #

Excavate and onsite remediation

No Land Treatment

No Bioremediation (or enhanced bioremediation)

No Chemical oxidation

No 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.

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:

None

Volume of E&P Waste (solid) in cubic yards 81

E&P waste (solid) description Stained soil

COGCC Disposal Facility ID #, if applicable: 0

Non-COGCC Disposal Facility:

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

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? Yes

If YES:

[X] 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? No

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.

Site will be reclaimed in accordance with applicable COGCC rules at the time of final site closure.

Is the described reclamation complete?

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.

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/10/2020

Proposed site investigation commencement. 12/10/2020

Proposed completion of site investigation.

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/29/2021

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:` Kent Gilbert Title: Manager

Submit Date:` 07/20/2021 Email: kgoil@msn.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: Jason Kosola Date: 08/25/2021

Remediation Project Number: 16224

Condition of Approval

COA Type	Description
	Based on the information presented, it appears that no further action is necessary at this time and the COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or remediation activities may be required. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.
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
402750863	FORM 27-SUPPLEMENTAL-SUBMITTED
402753692	ANALYTICAL RESULTS
402753693	SOIL SAMPLE LOCATION MAP
402753695	REMEDIATION PROGRESS REPORT
402753696	ANALYTICAL RESULTS

Total Attach: 5 Files

General Comments

User Group	Comment	Comment Date
Environmental	Analytical results demonstrate that background concentrations of arsenic (As) exceed Table 915-1 concentration levels. Analytical results demonstrate that concentrations of As in soils in the remediation area also exceed Table 915-1 concentration levels. Arsenic concentrations are greater than but within the analytical uncertainty of being equal to the background concentrations. COGCC and CDPHE have consulted and agree that operators do not need to request variances from CDPHE for instances where the concentrations of metals in impacted soils are equal to or less than background concentrations, but do not meet Table 915-1 concentration values.	08/25/2021
Environmental	Site reclamation has been referred to COGCC area Reclamation Specialist. Operator shall submit Form 4 to area Reclamation Specialist requesting reclamation inspection when site reclamation is completed.	08/25/2021

Total: 2 comment(s)