

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

CHRIS CANFIELD

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: <u>CRESTONE PEAK RESOURCES OPERATING LLC</u>	Operator No: <u>10633</u>	Phone Numbers
Address: <u>1801 CALIFORNIA STREET #2500</u>		Phone: <u>(303) 774-4017</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>(720) 925-1820</u>
Contact Person: <u>Schuyler Hamilton</u>	Email: <u>Schuyler.Hamilton@CrestonePR.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18566 Initial Form 27 Document #: 402709518

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>LOCATION</u>	Facility ID: <u>335767</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>COSTIGAN 13-20 NWSW MULTI-WELL PAD 13-20</u>		Latitude: <u>40.033670</u>	Longitude: <u>-105.033520</u>
		** correct Lat/Long if needed: Latitude: <u>40.033415</u>	Longitude: <u>-105.033234</u>
QtrQtr: <u>NWSW</u>	Sec: <u>20</u>	Twp: <u>1N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use 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

Occupied structures, non-domestic well.

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	70ft x 74ft x 25ft	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.

This form has been prepared to support removal of production equipment associated with this location. In accordance with COGCC Rule 911 and Rule 915, initial representative soil samples will be collected beneath the produced water vessel. Initial laboratory soil analysis will include only BTEX, 1,2,4 and 1,3,5 Trimethylbenzene, naphthalene, TPH, pH, EC, SAR and boron. Groundwater, if present, will also be collected and analyzed. Identified impacts will be reported as required for each discovery, and a Form 19 will be submitted, and remedial investigation will be conducted with excavation equipment.

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):

In accordance with COGCC Rule 911 and Rule 915 soil samples will be collected during closure of the produced water vessel as described in the Initial Action Summary. Initial laboratory analysis will include only BTEX, 1,2,4 and 1,3,5 Trimethylbenzene, naphthalene, TPH, pH, EC, SAR and boron. If impacts are confirmed, the full Table 915-1 list of analysis will be tested for and additional excavation effort may be conducted to delineate horizontal and vertical extents. Overburden stockpiles, if present, will be sampled prior to use as backfill with a frequency of 1 composite sample per 500 cubic yards of material and submitted for analysis of VOCs.

Proposed Groundwater Sampling

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

If groundwater is encountered during excavation activities, one sample will be collected for BTEX, naphthalene, 1,2,3 and 1,3,5, trimethylbenzene analysis. If impacts are confirmed, additional groundwater samples may be collected and analyzed for the full Table 915-1 groundwater constituents.

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 24

Number of soil samples exceeding 915-1 20

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

Approximate areal extent (square feet) 5180

NA / ND

-- Highest concentration of TPH (mg/kg) 7.9

-- Highest concentration of SAR 24.6

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 25

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 1

Number of groundwater monitoring wells installed 1

Number of groundwater samples exceeding 915-1 1

Highest concentration of Benzene (µg/l) 1

Highest concentration of Toluene (µg/l) 1

Highest concentration of Ethylbenzene (µg/l) 1

Highest concentration of Xylene (µg/l) 1

Highest concentration of Methane (mg/l) 1

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?

Two background samples were collected from native soils and bedrock in an area undisturbed by oil and gas activities and were analyzed for soil suitability and metals. These samples were collected from 10 feet (ft) and 18 ft below ground surface (bgs). The 10 ft sample was collected from within soil horizons and the 18 ft sample was collected from bedrock. Analytical results show native conditions have elevated levels of pH at 10ft and elevated SAR at 18ft.

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

Volume of solid waste (cubic yards) 1

Volume of liquid waste (barrels) 1

☐ 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.

Once visual evidence of a historical release was observed during the removal of the produced-water vessel, additional excavations were conducted, and impacted soil was removed and transported to a disposal facility. Approximately 3,792 cubic yards of soil were disposed of at the Front Range Landfill in Erie, Colorado. Transport and disposal records will be kept on file under usual and customary practice and are available upon request. Soil samples were collected and analyzed for Table 915-1 constituents until the horizontal and vertical extents of the excavation were within COGCC Table 915-1 organic allowable limits. Additional excavations were conducted to remove SAR and EC; however, due to the proximity of the Site to a historic landfill, the levels of SAR and EC appear to be the result of landfill subsurface influences beyond what would have resulted from a PWV release.

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.

In accordance with COGCC Rule 911 and Rule 915, representative surface soil samples were collected during the removal of a partially-buried produced water vessel (PWV). There were no hydrocarbon impacts exceedances in any of the samples as determined by laboratory analysis. The B07@25ft sample exceeded Table 915-1 allowable limits for arsenic at 8.98 mg/kg. Background concentrations of arsenic (BKG02@18') were 6.11 mg/kg. These concentrations are not irregular for arsenic concentrations in this land use type with no reason to believe that arsenic containing materials may have been used at this site (Colorado Department of Public Health and Environment Arsenic Concentrations in Soil, July 2014 -see attached). Therefore, arsenic has not been considered a contaminant of concern at this Site. Samples B02@17', N04@15', N05@15', N06@11', E05@12', S04@13', S05@14', B05@16', and B06@20' exceeded Table 915-1 cleanup concentrations for EC. Background EC concentrations ranged from 0.16 to 3.30mmhos/cm. Samples N04@15', N05@15', N06@11', E03@13', E04@12', E05@12', S04@13', S05@14', B05@16', and B06@20' exceeded Table 915-1 cleanup concentration for SAR. Background levels for SAR ranged from 1.60 to 11.4. Samples W01@10', W02@13', E03@13', E04@12', and B05@16' exceeded Table 915-1 cleanup concentration for pH. Background levels for pH ranged from 8.01 to 8.33. Samples E03@13' and E04@12' exceeded Table 915-1 cleanup concentrations for boron. Background levels for boron ranged from 0.618-0.758 mg/L. These remaining surface soil suitability exceedances will be addressed during final site reclamation. Because groundwater is estimated to be below 20ft bgs, and bedrock was encountered at approximately 10ft bgs, the samples which exceed the protection of groundwater soil screening level concentrations for metals were determined to be naturally occurring concentrations, and are not a threat to groundwater, or potentially the result of influences from the nearby historical landfill.

Soil Remediation Summary

<input type="checkbox"/> In Situ	<input checked="" type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	Yes Excavate and offsite disposal
_____ Chemical oxidation	If Yes: Estimated Volume (Cubic Yards) 3792
_____ Air sparge / Soil vapor extraction	Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ Natural Attenuation	_____ Excavate and onsite remediation
_____ Other _____	_____ 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.

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 NFA request

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&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? 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? 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.

No reclamation will be performed on the site unless the entire facility is removed from service or the activities migrate outside the original facility footprint. If these occur, the disturbance will be reclaimed in accordance with 1000 Series Rules, in collaboration with the landowner, and reported in a Form 4 (Sundry Notice) with proper documentation to demonstrate compliance with requirements for final reclamation.

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?

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. 06/07/2021

Actual Spill or Release date, or date of discovery. 06/07/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/07/2021

Proposed site investigation commencement. 06/07/2021

Proposed completion of site investigation. 08/03/2021

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/07/2021

Proposed date of completion of Remediation. 08/03/2021

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

This form has been prepared to document successful closure of the partially-buried produced-water vessel at this location and completion of remediation investigation related to Spill/Release Point ID 480161. Residential screening levels were utilized at this location based on nearby groundwater monitoring wells registering static water levels deeper than 20 feet below ground surface (bgs) and bedrock encountered at approximately 10 feet bgs. Please find the attached Site Diagram, Topographic Map, Lab Results Summary Table, a copy of the laboratory results, photolog, and a reference related to arsenic concentrations in soil (Colorado Department of Public Health and Environment Arsenic Concentrations in Soil, July 2014).

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

Signed: Maggie Graham

Title: Senior Project Manager

Submit Date: 09/09/2021

Email: Maggie.Graham@apexcos.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: CHRIS CANFIELD

Date: 09/21/2021

Remediation Project Number: 18566

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

	The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.
	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 groundwater is found to be impacted, then further investigation and/or remediation activities may be required.
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**

402797860	FORM 27-SUPPLEMENTAL-SUBMITTED
402806766	OTHER

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)