

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402845463

Receive Date:

Report taken by:

## 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>SIMCOE LLC</u>	Operator No: <u>10749</u>	<b>Phone Numbers</b>
Address: <u>1199 MAIN AVE SUITE 101</u>		Phone: <u>(970) 769-9523</u>
City: <u>DURANGO</u> State: <u>CO</u> Zip: <u>81301</u>		Mobile: <u>(970) 769-7523</u>
Contact Person: <u>Sabre Beebe</u>	Email: <u>sabre.beebe@ikavenergy.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: \_\_\_\_\_ Initial Form 27 Document #: 402845463

#### 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: Decom tanks and transfer pump house, remove imported material, move h2o line BG in valve can

#### SITE INFORMATION

☐ No ☐ Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>419311</u>	API #: _____	County Name: <u>ARCHULETA</u>
Facility Name: <u>PERINO WATER TRANSFER</u>	Latitude: <u>37.015027</u>	Longitude: <u>-107.449557</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>13</u>	Twp: <u>32N</u>	Range: <u>6W</u> Meridian: <u>N</u> Sensitive Area? <input type="checkbox"/> No

#### SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Non Crop land use

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

**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	SOILS	TBD	Field Screening & analytical results

**INITIAL ACTION SUMMARY**

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

Simcoe, LLC will be decommissioning the transfer station equipment, remove imported materials, removal of lines on location no longer in use, repipe the water line below grade. install a valve can around valves on water line, contour unused areas to as near natural contour as possible, rip, seed, mulch and crimp location, access road and areas disturbed for pipeline work.

**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 around and under the equipment. Sampling required will be performed as discrete soil samples for confirmation of compliance with Table 915-1.

**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**

Number of soil samples collected 0

Number of soil samples exceeding 915-1

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

Approximate areal extent (square 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

**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.

**NA / ND**

-- Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR

BTEX &gt; 915-1 No

Vertical Extent &gt; 915-1 (in feet)

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)

**OTHER INVESTIGATION INFORMATION**☐ Were impacts to adjacent property or offsite impacts identified?☐ Were background samples collected as part of this site investigation?☐ 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.

The Perino Water Transfer will be decommissioned. All transfer equipment on the transfer location will be removed.

**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.

Should impacted material be discovered during the execution of the scope of work will be removed and disposed of as E&P waste at an approved facility.

**Soil Remediation Summary**☐ In Situ☒ Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 5

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # 0

\_\_\_\_\_ 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.

## **REMEDATION 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? \_\_\_\_\_

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.

Removal of equipment on location except pipeline riser and valve sets for both the water line and gas line that is in a pipeline ROW. Removal of above grade water line and reinstallation of water line and valves below grade and valve can around water valves. Removal of imported materials. Recontour to as near as natural as practicable. Rip of reclamation area to alleviate compaction. Disk to prepare seed bed. Drill seed at recommended rates, mulch with certified weed free straw, and crimp. Seed mix will consist of native vegetation in surrounding area.

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? No \_\_\_\_\_

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? No \_\_\_\_\_

### **SITE RECLAMATION DATES**

Proposed date of commencement of Reclamation. 10/21/2021

Proposed date of completion of Reclamation. 11/12/2021

## 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). 10/21/2021

Proposed site investigation commencement. \_\_\_\_\_

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**

This form 27 is being submitted by Simcoe, LLC to decommission this location excluding the pipeline right of way. Simcoe, LLC intends to utilize previous background samples obtained in July of 2021.

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

Signed: Sabre Beebe

Title: Specialist

Submit Date:

Email: sabre.beebe@ikavenergy.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:

Date:

Remediation Project Number:

**COA Type****Description**

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**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**

402846634	SOIL SAMPLE LOCATION MAP
402846668	MAP
402847410	MAP
402847426	MAP

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)