

State of Colorado
Oil and Gas Conservation Commission

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402798606
Receive Date:
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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: <u>LARAMIE ENERGY LLC</u>	Operator No: <u>10433</u>	Phone Numbers
Address: <u>1001 17TH STREET #1900</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Matt Kasten</u>	Email: <u>mkasten@laramie-energy.com</u>	
		Phone: <u>(970) 9019007</u>
		Mobile: <u>(970) 9019007</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 17656 Initial Form 27 Document #: 402643723

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: Wellhead soil assessment P&A for the Hancock Gulch #1 SWD

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>UIC DISPOSAL</u>	Facility ID: <u>159293</u>	API #: _____	County Name: <u>MESA</u>
Facility Name: <u>HANCOCK GULCH #1</u>	Latitude: <u>39.364576</u>	Longitude: <u>-108.388351</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>13</u>	Twp: <u>8S</u>	Range: <u>99W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>077-08155</u>	County Name: <u>MESA</u>
Facility Name: <u>HANCOCK GULCH 1</u>	Latitude: <u>39.364576</u>	Longitude: <u>-108.388351</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>13</u>	Twp: <u>8S</u>	Range: <u>99W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: LOCATION Facility ID: 312419 API #: County Name: MESA
Facility Name: Hancock Gulch 1 Pad Latitude: 39.364576 Longitude: -108.388351
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NWNW Sec: 13 Twp: 8S Range: 99W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Non-crop land

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? Yes

Other Potential Receptors within 1/4 mile

The closest potential receptors to the Hancock Gulch #1 SWD are two intermittent drainages that run south and east of the location. South Dry Fork is approximately 150 feet due south of the location. Pedigo Gulch is approximately 800 feet east of the location.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
	SOILS	25sqft	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.

Laramie Energy is providing this Form 27 as initial notification for the plug and abandonment of the Hancock Gulch #1 SWD and associated flowline on the location.

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

Number of soil samples collected 12

Number of soil samples exceeding 915-1 2

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

Approximate areal extent (square feet) 25

NA / ND

-- Highest concentration of TPH (mg/kg) 37.00
7

-- Highest concentration of SAR 1.58

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

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?

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.

Additional excavation will be utilized to remove source removal. During wellhead/flowline exposure soil was screened and no impacts were observed. 0-5' material was utilized to safely berm around wellhead for safety and was not disposed of. All soil removed from wellhead area will be removed and disposed of at greenleaf (~ 10 yards)

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.

Timeline of closure will be delayed and is assumed that project will be closed in september 2021.

Soil Remediation Summary

<input type="checkbox"/> In Situ	<input type="checkbox"/> Ex Situ
_____ Bioremediation (or enhanced bioremediation)	_____ Excavate and offsite disposal
_____ Chemical oxidation	_____ If Yes: Estimated Volume (Cubic Yards) <u>10</u>
_____ 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

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.

Leak detection wells linked to REM 17614 data attached within DOC 402798536. (No impacts reported, not true monitoring wells)

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? _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

N/a

Volume of E&P Waste (solid) in cubic yards _____ 10

E&P waste (solid) description soil with inorganic impacts _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Greenleaf _____

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: _____

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.

Reclamation plan attached to previous submittals for site in initial Form 27. Reclamation of site will follow 1000 series rules and comply with BLM (landowner) surface reclamation agreement.

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). _____

Proposed site investigation commencement. 05/04/2021

Proposed completion of site investigation. 05/05/2021

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

During final decommission of site, wellhead area identified inorganic impacts that were excavated and identified in one sample that is not below background sampling efforts for location. Additional documentation provided and/or not listed within this submittal are linked to REM 17614. REM 17614 is linked to same site but is referenced to the tank area of the site during decommission.

Laramie is requesting:

1. Consideration of 915.b plan (attached) to continue with reclamation and leave inorganic impact (EC) in situ.
2. Closure of REM 17656

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

Signed: Matt Kasten

Title: Project Manager

Submit Date: 09/01/2021

Email: mkasten@laramie-energy.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: 10/22/2021

Remediation Project Number: 17656

Condition of Approval

COA Type

Description

	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if surface and/or ground water is found to be impacted, then further investigation and/or remediation activities will be required at the site. In addition, the non-working surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules including the establishment of vegetative cover on non-cropland and successful growth on cropland. Landowner must approve reclamation of cropland.
	Final reclamation will be conducted at a minimum in accordance with 1004 Rules, including, but not limited to, compaction alleviation (cross ripping to a depth of 18 inches), recontouring/regrading and revegetation. Operator shall implement and maintain stormwater and erosion control measures in accordance with good engineering practices to protect and stabilize the seeded soils.
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

402798606	FORM 27-SUPPLEMENTAL-SUBMITTED
402798635	PHOTO DOCUMENTATION
402798637	DISPOSAL MANIFESTS
402798638	RECLAMATION PLAN
402798639	ANALYTICAL RESULTS
402798641	SOIL SAMPLE LOCATION MAP
402798643	SOIL SAMPLE LOCATION MAP
402798645	ANALYTICAL RESULTS

Total Attach: 8 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	COGCC made the following updates to the form in order to pass validation: 1) Updated Soil Summary to document that BTEX did not exceed Table 915-1 (doc #402798645) 2) Updated Type of Waste to indicate E&P Waste - Produced Water 3) Updated Remediation Completion Summary to indicate that soil does not meet 915-1 and that groundwater does (to satisfy form validation requirement). 4) Changed Proposed Soil, Groundwater, and Surface Water Sampling from YES to NO because additional sampling is not proposed on this form. 5) Updated Soil Sample Summary to indicate that the extents of soil contamination have not been delineated. 6) Updated Purpose Information to document Rule 915.b request.	10/22/2021
Environmental	Attached analytical results (doc #402798645) document exceedance for EC (7.23) at sample ID NW Wall 7'.	10/06/2021

Total: 2 comment(s)