

State of Colorado
Oil and Gas Conservation Commission

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402845415
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10/20/2021

Report taken by:
Steven Arauza

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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 778-2314
City: DENVER State: CO Zip: 80202		Mobile: (970) 778-2314
Contact Person: Jake Janicek	Email: jjanicek@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20584 Initial Form 27 Document #: 402845415

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: SPILL OR RELEASE	Facility ID: 480751	API #: _____	County Name: GARFIELD
Facility Name: KRK 7-7A Dumpline	Latitude: 39.463069	Longitude: -107.702139	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 7	Twp: 7S	Range: 92W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Agriculture/Rangeland
Is domestic water well within 1/4 mile? Yes 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

Well Permit # 64199- for Domestic, Live Stock use.

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	Undetermined	Soil Sampling

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 Report of Work Completed (ROWC) detailing all initial spill characterization and results.

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):

Please see operator comments for this information.

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 1 -- Highest concentration of TPH (mg/kg) 3973.7
 Number of soil samples exceeding 915-1 1 -- Highest concentration of SAR 18.3
 Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 Yes
 Approximate areal extent (square feet) 600 Vertical Extent > 915-1 (in feet) 7

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?
 Four background soil samples were collected in each cardinal direction off the original pad disturbance in undisturbed, non-impacted native soil for the purposed of establishing background soil conditions per Colorado Oil and Gas Conservation Commission (COGCC) Rule.(2).D. Please see the attached document which details the background soil sampling locations.
- 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?
 The attached ROWC details initial release characterization. See the Site Investigation Plan section of this form for the proposed investigation activities.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.
 The source is a dumpline which will be replaced.

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.
 A remediation plan will be submitted once the impacts are delineated.

Soil Remediation Summary

- In Situ Ex Situ
- _____ Bioremediation (or enhanced bioremediation) Yes _____ Excavate and offsite disposal
- _____ Chemical oxidation _____ If Yes: Estimated Volume (Cubic Yards) 100
- _____ 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.

Empty text box for groundwater monitoring description.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Empty text box for alternative schedule.

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Empty text box for alternative schedule.

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 _____ 0

E&P waste (solid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____ 30

E&P waste (liquid) description hydrovac rinsate mixed with impacted soil

COGCC Disposal Facility ID #, if applicable: _____ 426582

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.

Any disturbance will be returned to the active working surface of the well pad for continued operation. When the site is decommissioned at a later date, it will be reclaimed in accordance with 1000 Series regulations.

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. 09/07/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/05/2021

Proposed site investigation commencement. 11/03/2021

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 is to serve as 4th Quarter 2021 update which details spill characterization results to date. Please see the attached ROWC for project background and summary of initial investigative activities completed. Once approved Caerus will schedule to complete the delineation phase of this investigation. All additional findings will be submitted in a supplemental Form 27.

Proposed Soil Sampling Plan:

Caerus plans to conduct delineation assessment activities to define identified hydrocarbon impacts beneath the point of release (POR) location. These activities will include using a hydro-vacuum tuck in an attempt to delineate all remaining hydrocarbon impacts both vertically and laterally beneath the POR location. Once impact extents are determined through soil screening techniques [visual, olfactory observations, and field screening soil samples for volatile organic compounds using a photoionization detector (PID)] soil samples will be collected to confirm. Caerus requests a reduced analyte suite for all future samples collected as part of this project based on analytical results of the sample collected at the POR. This suite would consist of only the analytes (barium, chromium (VI), TPH, benzene, toluene, ethylbenzene, total xylenes, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, SAR and pH) that soil sample 20211005-H7(POR)@7.5' exhibited exceedances for.

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

Signed: Dustin Held

Title: Sr. Consultant, Geologist

Submit Date: 10/20/2021

Email: dustin.held@wsp.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: 10/28/2021

Remediation Project Number: 20584

Condition of Approval

COA Type

Description

	Operator shall comply with Rule 915.e.(2).B by collecting samples from areas most likely to have been impacted and by collecting an appropriate number of representative soil samples to delineate the horizontal and vertical extents of contamination.
	Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater. The Operator shall analyze samples for the conditionally-approved reduced analyte suite and shall delineate the extent of impacts using the Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.
	Submit Supplemental eForm 19 to request closure of Spill/Release ID #480751. Supplemental report shall comply with outstanding COAs, indicate that work is proceeding under an approved eForm 27 and shall reference the Remediation Project number assigned upon approval of this report.
	Based on the analytical results provided for the POR sample, the Operator's request for a reduced analyte suite of: barium chromium(VI) TPH BTEX 1,2,4-trimethylbenzene 1,3,5-trimethylbenzene naphthalene SAR pH Is approved with the condition that the Operator also analyze samples for 1-methylnaphthalene and 2-methylnaphthalene.

4 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.

<u>Att Doc Num</u>	<u>Name</u>
402845415	FORM 27-INITIAL-SUBMITTED
402848067	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Attached analytical report (doc #402848067) indicates that POR sample exceeded Table 915-1 for 1-methylnaphthalene (0.863 mg/kg) and 2-methylnaphthalene (2.02 mg/kg). These analytical results are not included in the requested reduced analyte suite or on the analytical summary table (Table 1), which reports both values as "ND." See COAs above.	10/28/2021

Total: 1 comment(s)