

# State of Colorado Oil and Gas Conservation Commission

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402860904

Receive Date:

11/03/2021

Report taken by:

Jason Kosola

## 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>WESTERN OPERATING COMPANY</u>	Operator No: <u>95620</u>	<b>Phone Numbers</b>
Address: <u>1165 DELAWARE STREET #200</u>		Phone: <u>(303) 893-2438</u>
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80204</u>
Contact Person: <u>Steve James</u>	Email: <u>steve@westernoperating.com</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 20712 Initial Form 27 Document #: 402860904

#### 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>WELL</u>	Facility ID: _____	API #: <u>061-06023</u>	County Name: <u>KIOWA</u>
Facility Name: <u>DAWSON A 1</u>		Latitude: <u>38.424060</u>	Longitude: <u>-102.466500</u>
		** correct Lat/Long if needed: Latitude: <u>38.423673</u>	Longitude: <u>-102.465408</u>
QtrQtr: <u>NENW</u>	Sec: <u>9</u>	Twp: <u>19S</u>	Range: <u>45W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>No</u>

#### SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Cattle grazing

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? Yes

## Other Potential Receptors within 1/4 mile

One DWR Permitted well (Receipt # 0420224) is located approximately 1,50 feet west-southwest of the Site. Site specific depth to groundwater is unknown as no depth to water is reported for DWR well Receipt # 0430224, but may be present at less than 20 feet below ground surface based on the well log of DWR well Receipt # 9087905 (located ~1.7 miles west-southwest of site), which reported a water depth of 14 feet below ground surface in 1966. A residential home is located approximately 890 feet west-northwest of the site. The site is located within mapped Lesser Prairie Chicken High Priority Habitat Area. No other potential receptors or sensitive areas were identified.

## 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	Unknown	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.

COGCC inspected the site on October 27, 2021 (Field Inspection Form Document Number 690202223) and identified oily soil present west of the tank battery. It is believed that this material is residual from the closed remediation project 3546. Western Operating is currently scheduling source removal excavation to remove the identified oily soil remaining.

### 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 ):

Confirmation samples will be collected from scraped/excavated area per COGCC Rule 915.e.(2) and submitted for analysis of benzene, toluene, ethylbenzene, total xylenes, total petroleum hydrocarbons (C6-C36), electrical conductivity, sodium adsorption ratio, pH, and hot water soluble boron.

#### Proposed Groundwater Sampling

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

If groundwater is encountered during source removal activities, one grab sample will be collected for analysis of the Table 915-1 organic compounds in water.

#### 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 \_\_\_\_\_ 0  
Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_  
Approximate areal extent (square feet) \_\_\_\_\_ 5000

**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 > 915-1 \_\_\_\_\_  
\_\_\_\_\_ Vertical Extent > 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 oily soil will be removed by excavation and transported offsite to a properly permitted waste disposal facility.

**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 above.

**Soil Remediation Summary**

☐ In Situ

☐ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Excavate and offsite disposal  
If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_  
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.

## **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.

Location will be reclaimed in accordance with 1000 series rules following remediation.

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. 10/27/2021

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/27/2021

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**

Western Operating is currently scheduling the planned remediation activities described in this submittal which is expected to occur within a month.

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

Signed: Steve James

Title: President

Submit Date: 11/03/2021

Email: steve@westernoperating.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: 11/09/2021

Remediation Project Number: 20712

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

	<p>Facility Closure Supplemental Report Timing A supplemental Form 27 must be submitted within 90 days of the completion of this environmental investigation</p>
Interim Reclamation	<p>Inorganic Sampling Beyond Root Zone If a spill/release of produced fluids or E&amp;P waste causes an impact from inorganic constituents to soil, the operator should perform sampling and analysis to fully delineate the lateral and vertical extent of those impacts. The prior 2008 FAQ response #32 is no longer valid. Operator shall sample the area(s) most likely to be impacted regardless of depth below ground surface.</p>
	<p>913.e.(3) Reporting Schedule In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule.</p>
	<p>913.d Implementation Schedule In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.  Per Rule 913.d.(2) Operator shall submit a Supplemental Form 27 with an updated Implementation Schedule at least 14 days in advance of any schedule changes.</p>
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.

**Att Doc Num****Name**

402860904	FORM 27-INITIAL-SUBMITTED
402861037	AERIAL IMAGE

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)