

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402863448

Receive Date:

11/08/2021

Report taken by:

BOB CHESSON

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>HIGHPOINT OPERATING CORPORATION</u>	Operator No: <u>10071</u>	Phone Numbers Phone: <u>(720) 315-8934</u> Mobile: <u>()</u>
Address: <u>555 17TH ST STE 3700</u>		
City: <u>DENVER</u>	State: <u>CO</u> Zip: <u>80202</u>	
Contact Person: <u>Luke Kelly</u>	Email: <u>lkelly@civiresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20722 Initial Form 27 Document #: 402863448

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>462025</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Grinde 1-64-5_4 PF</u>		Latitude: <u>40.078200</u>	Longitude: <u>-104.579660</u>
		** correct Lat/Long if needed: Latitude: <u>40.077835</u>	Longitude: <u>-104.579889</u>
QtrQtr: <u>NWSW</u>	Sec: <u>5</u>	Twp: <u>1N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

Domestic stock well - Permit # 159679 - ~1300' SW
Denver-Hudson Canal - ~140' SE

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
No	GROUNDWATER	NA	Laboratory Analysis
Yes	SOILS	12'x8'x6'	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.

While performing semi-annual pressure testing on the Grinde 1-64-5_4 NWSW comingled produced water dumphline, produced fluids were seen rising to the surface around the separator. The flowline was immediately isolated and blowdown. Vacuum trucks were mobilized to expose the compromised line and allow access for repairs. The line will be pressure tested prior to returning to service. The impacted soil was removed and confirmation soil samples were collected and submitted for laboratory analysis in compliance with COGCC Table 915-1. The release did not occur in CPW high priority habitat.

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):

Four grab soil samples were collected for laboratory analysis of TPH C6-36, organics, and inorganics. EX-SS-02@6' was also analyzed for Table 915-1 metals. A background sample was collected for analysis of EC, SAR, Arsenic, Barium, and Selenium.

Additional soil samples will be collected for laboratory analysis of EC, SAR, Arsenic and Selenium.

Proposed Groundwater Sampling

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

One grab groundwater sample was collected for analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene. One additional grab groundwater sample will be collected following additional soil removal and analyzed for dissolved metals. There were no visual or olfactory evidence to indicate groundwater impacts.

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):

Additional soil will be removed from the site containing inorganic and metal values exceeding COGCC Table 915-1 regulatory limits. Confirmation soil samples will be collected in compliance with COGCC Table 915-1. Due to restricted access and safety concerns, Bonanza requests to leave any residual soil conditions exceeding COGCC Table 915-1 in place until facility decommissioning is completed.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 4

Number of soil samples exceeding 915-1 4

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

Approximate areal extent (square feet) 96

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 24.2

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 1

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 6'

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

ND 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?

A background sample for Arsenic, Barium, Selenium, EC, and SAR was collected adjacent to the facility boundaries.

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

Volume of solid waste (cubic yards) 25

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Additional soil will be removed and the excavation sampled for EC, SAR, Arsenic, and Selenium in compliance with applicable COGCC Table 915-1 regulatory limits. An additional grab groundwater sample will be collected for dissolved metals analysis.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Bonanza proposes to utilize Table 915-1 residential screening levels for any residual metals in soil following additional soil removal. Groundwater was not impacted for Table 915-1 organics.

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.

Additional soil will be removed from the site containing inorganic and metal values exceeding COGCC Table 915-1 regulatory limits. The excavation will then be sampled for EC, SAR, Arsenic, and Selenium in compliance with COGCC Table 915-1 residential soil screening levels. Due to restricted access and safety concerns, Bonanza requests to leave any residual inorganic/metal soil conditions exceeding COGCC Table 915-1 in place until facility decommissioning is completed.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

☐ Bioremediation (or enhanced bioremediation)
☐ Chemical oxidation
☐ Air sparge / Soil vapor extraction
☐ Natural Attenuation
☐ Other _____

☐ Yes Excavate and offsite disposal
☐ If Yes: Estimated Volume (Cubic Yards) _____ 25
☐ Name of Licensed Disposal Facility or COGCC Facility ID # _____
☐ Excavate and onsite remediation
☐ 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.

An additional grab groundwater sample will be collected for dissolved metals.

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 Initial Assessment Summary

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:

no beneficial use

Volume of E&P Waste (solid) in cubic yards 25

E&P waste (solid) description soil > COGCC Table 915-1 regulatory limits

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Conservation Services Inc

Volume of E&P Waste (liquid) in barrels 0

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.

The location is an active production facility.

Reclamation will be completed in accordance with COGCC 1000 series rules following facility decommissioning activities at a later date. Any inorganic or metal soil conditions will be addressed at that time.

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. 10/05/2021

Actual Spill or Release date, or date of discovery. 10/05/2021

SITE INVESTIGATION DATES

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

Proposed site investigation commencement. 10/15/2021

Proposed completion of site investigation.

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/05/2021

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

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

Signed: Luke Kelly

Title: Env. Supervisor

Submit Date: 11/08/2021

Email: lkelly@civiresources.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: BOB CHESSON

Date: 11/09/2021

Remediation Project Number: 20722

Condition of Approval

COA Type

Description

0 COA	

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

402863448	FORM 27-INITIAL-SUBMITTED
402863508	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	The submittal has been approved. However, staff does not approve any blanket request to leave any residual inorganic/metal soil conditions exceeding COGCC Table 915-1 in place until decommission of the facility. The operator must remediate all impacted soils unless site safety or operating conditions make remediation actions unsafe. Staff will revisit the request for remediation delay on a site specific basis.	11/09/2021
Environmental	The operator will submit a supplemental Form 27 within 45 days of the completion of the actions described in this submission.	11/09/2021

Total: 2 comment(s)