

# State of Colorado Oil and Gas Conservation Commission

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01/07/2022

Report taken by:

Jason Kosola

## 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: CITATION OIL & GAS CORP	Operator No: 17180	<b>Phone Numbers</b>
Address: 14077 CUTTEN RD		
City: HOUSTON State: TX Zip: 77069		
Contact Person: Bob Redweik	Email: BRedweik@cogc.com	
		Phone: (281) 8911550
		Mobile: (713) 7027534

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 20326 Initial Form 27 Document #: 402831518

#### 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: 480289	API #: _____	County Name: CHEYENNE
Facility Name: Arapahoe Unit Sec. 25S Tank Battery	Latitude: 38.799195	Longitude: -102.053450	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 25	Twp: 14S	Range: 42W Meridian: 6 Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Livestock Grazing

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

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
Yes	SOILS	1673 cubic feet	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.

Fluid inside berm was removed via vac truck.

### 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 ):

Eight (8) soil grab samples were collected from the release area. The soil sample locations are described in the soil sample maps attached to this Form 27.

#### 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 ):

The full depth of the impacted soil shall be determined during dig and haul activities.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 8

Number of soil samples exceeding 915-1 8

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

Approximate areal extent (square feet) 1673

-- Highest concentration of TPH (mg/kg) 251

-- Highest concentration of SAR 58

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 1

#### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 1

Number of groundwater monitoring wells installed

Number of groundwater samples exceeding 915-1

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)

#### 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?

Three (3) background samples were collected from adjacent soils.

☐ 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 full depth of the impacted soil shall be determined during dig and haul activities.

### 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.

Impacted soils are to be removed from the location and disposed of at an approved landfill.

#### REMEDIAL 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.

Impacted soils are to be removed from the location and disposed of at an approved landfill. NFA status is anticipated to be complete by 1/1/2022.

#### Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 500

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.

## **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? Yes

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

All E&P contaminated soil was removed and disposed at the WM Colorado Springs Landfill.

Volume of E&P Waste (solid) in cubic yards 408

E&P waste (solid) description E&P Exempt Contaminated Soil

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: WM - Colorado Springs Landfill

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

E&P waste (liquid) description \_\_\_\_\_

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: \_\_\_\_\_

## **REMEDATION COMPLETION REPORT**

## **REMEDIATION COMPLETION SUMMARY**

Is this a Final Closure Request for this Remediation Project? No \_\_\_\_\_

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.

This location will remain an active oil and gas location after remediation actions are complete. Fill material will replace all excavated soils and containment shall be reconstructed.

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). 07/14/2021

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

Proposed completion of site investigation. \_\_\_\_\_

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 11/10/2021

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

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

All confirmation soil sample analyses were below Table 915-1 maximum contaminant levels (MCLs) for organic compounds. All soil sample analyses were above Table 915-1 acceptable concentrations for arsenic, including two background samples. Citation is requesting relief from elevated arsenic concentrations as background arsenic concentrations have been established to be in excess of Table 915-1 maximum contaminant levels. The CDPHE document attached to this Form 27 discusses background arsenic concentrations in Colorado and identifies naturally occurring arsenic values less than 11 mg/kg to not require further action. Furthermore, arsenic is not a known or expected contaminant that is produced by Citation's operations at the Arapahoe Unit 25S location.

Four (4) soil sample analyses were above Table 915-1 MCLs. Analysis of AU\_SS\_03, sample depth 48", identified an EC of 4.74 mmhos/cm and SAR of 16.1. Analysis of AU\_SS\_04, sample depth 48", identified a SAR of 20.3 and pH of 8.42. Analysis of AU\_SS\_05\_SW, sample depth 36", identified an EC of 5.18 mmhos/cm and SAR of 8.71. Analysis of AU\_SS\_06\_SW, sample depth 36", identified a SAR of 9.81.

All Table 915-1 MCL exceedances occur at a depth of three (3) feet or greater. These exceedances occur at depths beyond the vegetation root zone and under an active oil and gas location. These exceedances do not constitute adverse impacts to the environment due to their depth in soil profile and, if necessary, can be further addressed upon final closure of the location. Citation is requesting final closure of this remediation project at this time.

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

Signed: Randolph Moses

Title: Agent

Submit Date: 01/07/2022

Email: Randolph.Moses@AbsarokaSolutions.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: 01/14/2022

Remediation Project Number: 20326

## 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

402919044	FORM 27-SUPPLEMENTAL-SUBMITTED
402919257	MAP
402919259	OTHER
402919261	ANALYTICAL RESULTS
402919262	OTHER
402919264	DISPOSAL MANIFESTS
402919265	OTHER
402919711	PHOTO DOCUMENTATION
402920427	SOIL SAMPLE LOCATION MAP

Total Attach: 9 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Removed closure request. Spill area is not compliant with 915-1 limits.	01/14/2022

Total: 1 comment(s)