

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402928862

Receive Date:

Report taken by:

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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 285-2925
City: DENVER State: CO Zip: 80202		Mobile: (970) 640-6919
Contact Person: Blair Rollins	Email: brollins@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16594 Initial Form 27 Document #: 402585991

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: 478403	API #: _____	County Name: GARFIELD
Facility Name: N23 water transfer system	Latitude: 39.502900	Longitude: -108.187407	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: sesw	Sec: 23	Twp: 6S	Range: 97W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Non-cropland rangeland

Is domestic water well within 1/4 mile? No 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

An unnamed spring is located approximately 0.3 miles south of the spill location.

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	To be determined	Laboratory analytical results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Please refer to COGCC Document Numbers 402519107 and 402525660 for this information.

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):

Caerus will determine the extent of contamination associated with the release by installation of soil borings within the area of the release, see proposed soil boring location map.

Proposed Groundwater Sampling

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

In the event that groundwater is encountered, Caerus will attempt to collect a representative groundwater sample for COGCC Table 915-1 analysis.

Proposed Surface Water Sampling

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

Caerus will continue to monitor the unnamed spring located approximately 0.3 miles south of the location. In the event that fluid is identified coming from the spring, Caerus will collect a representative sample for COGCC Table 915-1 analysis.

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 14

Number of soil samples exceeding 915-1 7

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

Approximate areal extent (square feet) 15000

-- Highest concentration of TPH (mg/kg) 4733

-- Highest concentration of SAR 36

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet) 100

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 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?

Caerus utilized background soil samples from the Mesa 16 (COGCC Location ID 335519). Please refer to the tabulated data and lab report for this information.

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

Volume of solid waste (cubic yards) 48

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Caerus will determine the extent of contamination associated with the release by installation of soil borings within the area of the release, see proposed soil boring location map.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Based on the attached Q4 powered-SVE trailer results, Caerus proposes to conduct quarterly SVE of the site with augmented solar-powered SVE trailer events (when a trailer is available) to remove the source of impacts associated with this project. Once SVE trailer exhaust data indicates remediation is near completion, Caerus will conduct soil boring installation to demonstrate compliance with the reduced analyte suite and the additional analytes found on the COGCC Table 915-1 soil standards.

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.

Based on the attached Q4 powered-SVE trailer results, Caerus proposes to conduct quarterly SVE of the site with augmented solar-powered SVE trailer events (when a trailer is available) to remove the source of impacts associated with this project. Caerus will closely monitor SVE data to determine the estimated time to successfully remediate the project. Once SVE trailer exhaust data indicates remediation is near completion, Caerus will conduct soil boring installation to demonstrate compliance with the reduced analyte suite and the additional analytes found on the COGCC Table 915-1 soil standards.

Soil Remediation Summary

☒ In Situ

☐ Ex Situ

Yes Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

No Chemical oxidation

If Yes: Estimated Volume (Cubic Yards)

Yes Air sparge / Soil vapor extraction

Yes Natural Attenuation

Other

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

No Bioremediation (or enhanced bioremediation)

No Chemical oxidation

No Air sparge / Soil vapor extraction

No Natural Attenuation

No 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.

In the event groundwater is encountered at the site and determined to be impacted, Caerus will prepare a remediation strategy for the site and provide this information to the COGCC under a Supplemental eForm 27.

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 Q4 2021 REM update

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:

REMEDATION COMPLETION REPORT

REMEDATION 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? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

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.

Caerus will return the well pad to the active working surface of the location for continued use.

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? Yes _____

If YES, does the seed mix comply with local soil conservation district recommendations? Yes _____

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). 10/29/2020

Proposed site investigation commencement. 06/07/2021

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

Caerus will continue to conduct quarterly powered-SVE trailer remediation events and provide updates on subsequent Form 27s.

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

Signed: Blair Rollins

Title: EHS Specialist

Submit Date: _____

Email: brollins@caerusoilandgas.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: _____

Date: _____

Remediation Project Number: 16594

COA Type

Description

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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

402928880	REMEDATION PROGRESS REPORT
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Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)