

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402927280

Receive Date:

01/20/2022

Report taken by:

RICK ALLISON

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
Address: <u>555 17TH ST STE 3700</u>		Phone: <u>(720) 315-8934</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>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21699 Initial Form 27 Document #: 402927280

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>SPILL OR RELEASE</u>	Facility ID: <u>480748</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Fiducial 6-62-34_35 SWSW</u>		Latitude: <u>40.440320</u>	Longitude: <u>-104.317498</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWSW</u>	Sec: <u>34</u>	Twp: <u>6N</u>	Range: <u>62W</u>
		Meridian: <u>6</u>	Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use non-crop

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

Riverine - 455' ENE
Freshwater Emergent - 4870' NNW

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
UNDETERMINED	GROUNDWATER	N/A	Pending Assessment
Yes	SOILS	54'x38'x8.5'	Laboratory Analytical

INITIAL ACTION SUMMARY

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

On September 14, 2021, a compromised separator released approximately 2.5 bbls of oil to the ground outside of containment. The separator was removed, and impacted soil was removed and transported to an off-site disposal location. Confirmation soil samples were collected and submitted for laboratory analysis.

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):

A total of 30 grab confirmation soil samples were collected from the site following source removal activities. Samples were submitted for TPH (C6-C36), and organic compounds in soil per COGCC Table 915-1. Soil samples were analyzed by a certified laboratory using COGCC approved methods.

A site investigation will be completed to laterally and vertically define (where accessible) the residual organic compounds that exceed COGCC Table 915-1 protection of groundwater soil screening levels (CS-SS-08 & CS-FS-05). Confirmation samples will be collected for TPH (C6-C36) and Table 915-1 organics. 5 locations are proposed for sample collection. The proposed assessment map is attached.

Proposed Groundwater Sampling

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

One boring will be advanced to ~30' or refusal (whichever is encountered first) to confirm the presence/absence of groundwater at the site. Based on lithology and water well reviews of the surrounding area, groundwater is not expected to be encountered. If groundwater is encountered, a temporary monitoring well will be installed to sample the groundwater for BTEX, naphthalene, and TMBs.

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):

A soil boring assessment is proposed to laterally and vertically define residual protection of groundwater soil screening level impacts observed in CS-SS-08 and CS-FS-05. Lateral definition soil borings will be advanced to a minimum depth of 15 feet bgs. The location adjacent to the release location is proposed a total depth 30 feet or refusal (whichever is encountered first). If groundwater is not encountered, refusal/consolidated lithology is encountered, and/or residual organics in soil per COGCC Table 915-1 concentrations do not exceed COGCC Table 915-1 residential soil screening levels, no further action for the release will be requested.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 30

Number of soil samples exceeding 915-1 10

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

Approximate areal extent (square feet) 2050

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 1

Number of groundwater samples exceeding 915-1 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) 1685.2

NA Highest concentration of SAR

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 9

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?

A soil boring assessment is proposed to laterally and vertically define residual protection of groundwater soil screening level impacts observed in CS-SS-08 and CS-FS-05. Soil samples will be collected for TPH (C6-C36) and Table 915-1 organics in soil. 5 locations are proposed for sample collected. The proposed assessment map is attached.

If groundwater is not encountered, refusal/consolidated lithology is encountered, and/or residual organics in soil per COGCC Table 915-1 concentrations do not exceed COGCC Table 915-1 residential soil screening levels, no further action for the release will be requested.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

As of 12/1/2021, soil identified to exceed COGCC Table 915-1 was removed and transported offsite for disposal.

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.

As of 12/1/2021, soil identified to exceed COGCC Table 915-1 was removed and transported offsite for disposal. Residual organics in soil per COGCC Table 915-1 exceed the COGCC Table 915-1 protection of groundwater soil screening levels (GSLs), only. A site investigation will be completed to determine the applicability of GSLs at the site. If groundwater is not encountered and/or residual concentrations in soil are laterally and vertically defined during the site assessment, Bonanza Creek proposes to close the remediation using the residential soil screening levels per COGCC Table 915-1.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 380

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

No _____ 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.

N/A

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 Release 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 380

E&P waste (solid) description Soil > COGCC Table 915- standards

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Buff Ridge

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

E&P waste (liquid) description N/A

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: N/A

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 release location is an active O&G facility. Reclamation in accordance with COGCC 1000 Series Rules will be completed following decommissioning activities at a later date.

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. 09/14/2021

Actual Spill or Release date, or date of discovery. 09/14/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/14/2021

Proposed site investigation commencement. 10/05/2021

Proposed completion of site investigation. 02/28/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/14/2021

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

Subsurface assessment activities are scheduled for the week of January 24, 2022. This schedule may change due to weather or other unforeseen circumstances.

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

Signed: Luke Kelly

Title: Supervisor-Env Specialist

Submit Date: 01/20/2022

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: RICK ALLISON

Date: 01/21/2022

Remediation Project Number: 21699

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

402927280	FORM 27-INITIAL-SUBMITTED
402927363	REMEDATION PROGRESS REPORT
402927370	SITE INVESTIGATION PLAN

Total Attach: 3 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	received with corrections	01/21/2022
Environmental	Returned to Draft: Please remove the "Other: Subsurface Assessment Proposal" from the purpose tab.; Please include an implementation date for the site assessment.	01/20/2022

Total: 2 comment(s)