

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

Jim Hughes

## 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: <u>OLD OPERATORS - STATUS UNKNOWN</u>	Operator No: <u>99999</u>	<b>Phone Numbers</b>
Address: <u>SEE COMMENT LINE IN WELL</u>		Phone: <u>(970) 946-3761</u>
City: <u>XXXXXXX</u>	State: <u>XX</u>	Zip: <u>          </u>
Contact Person: <u>Jacob Harter</u>	Email: <u>jharter@cottonwoodconsulting.com</u>	Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 20494 Initial Form 27 Document #: 402705567

#### 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: Plug and abandon well and decommission on site production equipment and flow line (s).

#### SITE INFORMATION

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: <u>          </u>	API #: <u>007-40037</u>	County Name: <u>ARCHULETA</u>
Facility Name: <u>Underwood Ditch (OWP) 5</u>		Latitude: <u>37.040120</u>	Longitude: <u>-106.841880</u>
** correct Lat/Long if needed: Latitude: <u>          </u>		Longitude: <u>          </u>	
QtrQtr: <u>NESE</u>	Sec: <u>4</u>	Twp: <u>32N</u>	Range: <u>1E</u>
Meridian: <u>N</u>		Sensitive Area? <u>Yes</u>	

#### SITE CONDITIONS

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

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**

Little Navajo River

## 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	SOILS	None	Field screening, 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.

The COGCC Orphan Well Program plugged the Underwood Ditch (OWP) #5 well and decommissioned the well site during the fall of 2021. Soil, wellbore gas, and wellbore fluid samples were collected in accordance with the Initial Form 27 for the project and COGCC Rule 915.e(2)B. No production equipment was located on the wellsite at the time of plugging and site decommissioning.

Two soil samples, including one background sample, were collected from the site; one was collected from the wellhead excavation and one was collected from nearby, non-impacted native soil. All soil samples were submitted for laboratory analysis of Table 915-1 constituents.

Per the conditions of approval (COAs) noted in the Initial Form 27, a wellbore gas sample and a wellbore fluid sample were collected. The wellbore gas sample was submitted for laboratory analysis of gas composition and stable isotopes and the wellbore fluid sample was submitted for laboratory analysis of major anions, cations, TDS, BTEX, DRO, GRO, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and dissolved gasses (RSK 175).

### 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 ):

All areas suspected of having potential impacts, including the wellhead, were visually inspected and field screened with a PID. Using these observations and field screening results, soil samples were collected from areas most likely to be impacted.

One discrete soil sample was collected from the wellhead excavation. No production equipment was located on the well site at the time of plugging and site decommissioning. Soil samples were submitted for laboratory analysis of Table 915-1 constituents. The attached project map provides the location of all samples.

#### Proposed Groundwater Sampling

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

No groundwater or pathway to groundwater was discovered during remediation activities; therefore, no groundwater samples were collected.

#### 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 ):

Per the conditions of approval (COAs) noted in the Initial Form 27, a wellbore gas sample and a wellbore fluid sample were collected. The wellbore gas sample was submitted for laboratory analysis of gas composition and stable isotopes and the wellbore fluid sample was submitted for laboratory analysis of major anions, cations, TDS, BTEX, DRO, GRO, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and dissolved gasses (RSK 175).

## SITE INVESTIGATION REPORT

## **SAMPLE SUMMARY**

### **Soil**

Number of soil samples collected 2  
Number of soil samples exceeding 915-1 0  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 0

### **NA / ND**

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 2.96  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 0

### **Groundwater**

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 0  
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?

One representative background soil sample was collected for the project from nearby, non-impacted native soil. Laboratory results indicate that the arsenic concentration exceeded the COGCC standard.

☐ 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**

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.

The well was plugged and the well site decommissioned during the fall of 2021. Soil, wellbore fluid, and wellbore gas samples were collected in accordance with the Initial Form 27. Based on the soil sampling results, it appears that no additional remediation is needed at the site. Please refer to attached Results Tables, Maps, and Photographs.

## **REMEDIAL ACTION 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 results of soil sampling conducted at the well site, no additional remediation is needed.

## **Soil Remediation Summary**

☐ In Situ

☐ Ex Situ

\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_  
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.

## **REMEDIATION 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 Facility closure \_\_\_\_\_

### **WASTE DISPOSAL INFORMATION**

Was E&P waste generated as part of this remediation? No

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? Yes \_\_\_\_\_

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? Yes \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? Yes \_\_\_\_\_

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.

Reclamation will be in accordance with COGCC 1000 Series Rules.

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. 06/01/2022

Proposed date of completion of Reclamation. 09/30/2022

## 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). 07/05/2021

Proposed site investigation commencement. 09/01/2021

Proposed completion of site investigation. 12/01/2021

## **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**

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

Signed: ` Jacob Harter \_\_\_\_\_

Title: Consultant \_\_\_\_\_

Submit Date: ` 01/25/2022 \_\_\_\_\_

Email: jharter@cottonwoodconsulting.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: Jim Hughes \_\_\_\_\_

Date: 01/31/2022 \_\_\_\_\_

Remediation Project Number: 20494 \_\_\_\_\_

## **Condition of Approval**

### **COA Type**

### **Description**

	Based on review of the information provided, it appears that no further action is necessary at this time and COGCC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.
1 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**

402933713	FORM 27-SUPPLEMENTAL-SUBMITTED
402933755	SITE MAP
402933757	ANALYTICAL RESULTS
402933759	ANALYTICAL RESULTS
402933760	PHOTO DOCUMENTATION
402933782	ANALYTICAL RESULTS
402933783	ANALYTICAL RESULTS
402933784	ANALYTICAL RESULTS
402933794	ANALYTICAL RESULTS

Total Attach: 9 Files

## **General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	On the Remediation Completion Report tab, the "Compliant with Rule 913.h.(2)." and "Compliant with Rule 913.h.(3)." boxes have been unchecked by COGCC EPS staff, after review of the documentation submitted.	01/31/2022

Total: 1 comment(s)