

State of Colorado Oil and Gas Conservation Commission

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402717897

Receive Date:

06/14/2021

Report taken by:

KRIS NEIDEL

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>CHEVRON USA INC</u>	Operator No: <u>16700</u>	Phone Numbers
Address: <u>760 HORIZON DRIVE STE 401</u>		Phone: <u>(970) 675-3814</u>
City: <u>GRAND JUNCTION</u> State: <u>CO</u> Zip: <u>81506</u>		Mobile: <u>(307) 871-5363</u>
Contact Person: <u>Chris Patterson</u>	Email: <u>spwu@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18354 Initial Form 27 Document #: 402642768

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>453765</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>UP 78-21 1</u>	Latitude: <u>40.125000</u>	Longitude: <u>-108.843900</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWSE</u>	Sec: <u>21</u>	Twp: <u>2N</u>	Range: <u>102W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Non Crop Land

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

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	426ft. x 2ft. x 0.5 ft	Field determined with tape measure

INITIAL ACTION SUMMARY

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

Injection alarms notified operators of a potential leak, to which operators were immediately dispatched, and found a flange leak on the edge of location next to injection well UP 78-21. Operators immediately shut in the well and call for a vacuum truck to collect all released free liquids. Approximately 2.2 BBLS of the 2.4BBLS were recovered, the area was water washed to remove residual salt concentrations. A soil sample location map and preliminary analytical results are included as an attachment.

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):

preliminary soil samples were collected on March 21, 2018 from the spill path. A total of five (5) grab samples analyzed for Table 910-1 parameters were collected at depths from 0 to 6 inches below ground surface (ft-bgs). Results show elevated DRO, SAR and EC levels within the impacted area. Subsequent soil samples analyzed for SAR at SS1 and SS2 sample locations, EC at SS1 sample location and DRO at the SS1 sample location will be collected during the summer of 2021 to monitor natural attenuation. The resample at SS1 is intended to give a current representation of DRO levels in this area. If the DRO level at the SS1 location continue to remain above the Table 910-1 standard then a subsequent Form 27 outlining remediation approach will be submitted. SAR and EC impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 7

Number of soil samples exceeding 915-1 0

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 852

NA / ND

-- Highest concentration of TPH (mg/kg) 900

-- Highest concentration of SAR 23

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 0

Number of groundwater samples exceeding 915-1 0

Highest concentration of Benzene (µg/l) 0

Highest concentration of Toluene (µg/l) 0

Highest concentration of Ethylbenzene (µg/l) 0

Highest concentration of Xylene (µg/l) 0

Highest concentration of Methane (mg/l) 0

Surface Water

0 Number of surface water samples collected

Number of surface water samples exceeding 915-1 0

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?

Samples collected

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

Volume of solid waste (cubic yards) 0

Volume of liquid waste (barrels) 0

☐ 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.

At this time no soil is intended for removal, however if the DRO level remains above Table 910-1 standards then impacted soil around the SS1 location will likely be removed. SAR and EC impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized. Subsequent soil samples analyzed for SAR at SS1 and SS2 sample locations, EC at SS1 sample location and DRO at the SS1 sample location will be collected during the summer of 2021 to monitor natural attenuation. The resample at SS1 is intended to give a current representation of DRO levels in this area.

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.

At this time no soil is intended for removal, however if the DRO level remains above Table 910-1 standards then impacted soil around the SS1 location will likely be removed. SAR and EC impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized. Subsequent soil samples analyzed for SAR at SS1 and SS2 sample locations, EC at SS1 sample location and DRO at the SS1 sample location will be collected during the summer of 2021 to monitor natural attenuation. The resample at SS1 is intended to give a current representation of DRO levels in this area.

Soil Remediation Summary

☒ **In Situ**

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Air sparge / Soil vapor extraction

Yes _____ Natural Attenuation

_____ Other _____

☐ **Ex Situ**

_____ Excavate and offsite disposal

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 REM Progress Rpt.

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:

REMEDIATION COMPLETION REPORT

REMEDIATION 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.

Site will be reclaimed and seeded once repairs are completed.

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. _____

Actual Spill or Release date, or date of discovery. 01/10/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/21/2018

Proposed site investigation commencement. _____

Proposed completion of site investigation. 03/21/2018

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

Kris - attached is the closure data package for the UP 78-21 spill (REM18354). Chevron is requesting closure of REM 18354 as all of the soil levels meet the Table 910-1 historical closure standards.

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

Signed: Tim Dobransky

Title: Principal Scientist

Submit Date: 06/14/2021

Email: tdobransky@entradainc.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: KRIS NEIDEL

Date: 02/07/2022

Remediation Project Number: 18354

Condition of Approval**COA Type****Description**

	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be impacted, then further investigation and/or remediation activities may be required at the site.
	The surface of this location appears to be Private, the operator shall comply with COGCC Reclamation Rules.
2 COAs	

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**

402717897	FORM 27-SUPPLEMENTAL-SUBMITTED
402717899	ANALYTICAL RESULTS

Total Attach: 2 Files

General Comments**User Group****Comment****Comment Date**

Environmental	It appears that natural attenuation was successful.	02/07/2022
Environmental	No identifying landmarks or coordinates are provided on maps.	02/07/2022
Environmental	It appears that the Origin of this spill is consistent with reported release point on the Form 19.	02/07/2022

Total: 3 comment(s)