

State of Colorado  
Oil and Gas Conservation Commission

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Report taken by:  
Steven Arauza

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	<b>Phone Numbers</b>
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

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

Number of soil samples exceeding 915-1 7

-- Highest concentration of SAR 36

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

BTEX > 915-1 No

Approximate areal extent (square feet) 15000

Vertical Extent > 915-1 (in feet) 8

**Groundwater**

Number of groundwater samples collected 0

NA Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? Yes

NA Highest concentration of Toluene (µg/l) \_\_\_\_\_

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

NA Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed 0

NA Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 0

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? No

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

Caerus will determine a path forward for removal of remaining impacts once delineation is complete.

**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.

Caerus will determine a path forward for removal of remaining impacts once delineation is complete.

**Soil Remediation Summary**

In Situ

Ex Situ

No Bioremediation ( or enhanced bioremediation )

       Excavate and offsite disposal

No Chemical oxidation

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

No Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

No Natural Attenuation  
Yes Other To be determined

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.

**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 Q3 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: \_\_\_\_\_

**REMEDIATION 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**

Due to maintenance issues with the powered SVE trailer, a quarterly SVE event was not conducted on the Remediation project during the 3rd quarter of 2021.

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: 01/18/2022 \_\_\_\_\_

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: Steven Arauz \_\_\_\_\_

Date: 02/11/2022 \_\_\_\_\_

Remediation Project Number: 16594 \_\_\_\_\_

### **Condition of Approval**

#### **COA Type**

#### **Description**

<b><u>COA Type</u></b>	<b><u>Description</u></b>
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**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
402928826	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 1 Files

### **General Comments**

#### **User Group**

#### **Comment**

#### **Comment Date**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Comply with outstanding COAs.	02/11/2022
Environmental	Per Rule 915.f, this project is subject to the current version of Table 915-1.	02/11/2022

Total: 2 comment(s)