

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

ROB YOUNG

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>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@civiresoures.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
Yes	SOILS	54'x38'x8.5'	Laboratory Analytical

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take 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 was completed to confirm the applicability of residential soil screening levels at the site. Five soil borings were completed and soil samples (12 total) from the borings were analyzed for TPH (C6-C36) and organics in soil as part of soil boring assessment activities. All collected samples were analyzed by a certified laboratory using approved COGCC lab analysis methods. Based on soil analytical results, all concentrations were in compliance with COGCC Table 915-1 regulatory limits. The original release has been laterally and vertically defined, and residual concentrations observed above COGCC Table 915-1 protection of groundwater soil screening levels are not a threat.

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 42

Number of soil samples exceeding 915-1 10

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

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?

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.

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

REMEDIAL 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 was completed to eliminate the applicability of GSLs at the site on 2/11/22. Direct push refusal was encountered at 20 feet bgs adjacent to the release location. Solid stem augers were utilized to complete a temporary, 1" well at 25 feet bgs. Groundwater was not observed during the assessment or subsequent gauging. Residual organics in soil at the site do not exceed COGCC Table 915-1 residential soil screening levels and appear laterally and vertically defined adjacent to the release location. Based on the confining layers observed during the soil boring assessment lack of groundwater at the site, COGCC Table 915-1 Protection of Groundwater Soil Screening Levels do not appear applicable and all analytical review was compared to applicable COGCC Table 915-1 residential soil screening levels, only.

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

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 Subsurface 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

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? No

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.

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. 02/11/2022

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/14/2021

Proposed date of completion of Remediation. 12/01/2021

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

Residual organics in soil at the site do not exceed COGCC Table 915-1 residential soil screening levels and appear laterally and vertically defined. Based on the confining layers observed during the soil boring assessment and lack of groundwater at the site, COGCC Table 915-1 protection of groundwater soil screening levels are not applicable. HPR requests No Further Action for Rem. # 21699.

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

Signed: Andrew Newberry

Title: Environmental Consultant

Submit Date: 03/15/2022

Email: anewberry@eagle-enviro.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: ROB YOUNG

Date: 03/23/2022

Remediation Project Number: 21699

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

	Based on the information presented, it appears that no further action is necessary at this time and the 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. In addition, the surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules.
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**

402984395	FORM 27-SUPPLEMENTAL-SUBMITTED
402984439	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)