

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

402998361

Receive Date:

04/12/2022

Report taken by:

Jim Hughes

## 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: CATAMOUNT ENERGY PARTNERS LLC	Operator No: 10464	<b>Phone Numbers</b> Phone: (720) 484-2346 Mobile: (303) 981-2921
Address: 1001 17TH STREET STE 1160		
City: DENVER	State: CO Zip: 80202	
Contact Person: Reed Fischer	Email: rfischer@catamountep.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 22782 Initial Form 27 Document #: 402998361

#### 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: Re-plug & subsequent abandonment of orphan wellbore

#### SITE INFORMATION

No Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 067-05545	County Name: LA PLATA
Facility Name: IGNACIO 34-8 (OWP) 3-18		Latitude: 37.218304	Longitude: -107.792089
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: SWNW	Sec: 18	Twp: 34N	Range: 8W Meridian: N Sensitive Area? Yes

#### SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Residential Housing  
 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

## 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	SOILS	undetermined	Discrete soil sample(s) will be obtained

### 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-site April 5, 2022 with COGCC and landowner found only the existing wellhead and no waste or waste impacts or debris.

### 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 ):

At least one discrete sample at wellhead

#### Proposed Groundwater Sampling

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

After drill out of surface and shoe plugs, if water is encountered prior to plug sets, it will be sampled and analyzed.

#### 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

NA / ND

Number of soil samples collected 0

Number of soil samples exceeding 915-1

Was the areal and vertical extent of soil contamination delineated?

Approximate areal extent (square feet)

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1

Vertical Extent > 915-1 (in feet)

#### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

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?

Background sample will be obtained at the same time as any soil sampling

☐ 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

#### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Excavate and haul to approved commercial disposal

#### 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.

If soil is determined to be contaminated, the contaminated soil will be excavated and replaced with clean soil and the contaminated soil will be hauled to an approved disposal facility

#### Soil Remediation Summary

☐ In Situ

☐ Ex Situ

Bioremediation ( or enhanced bioremediation )

Chemical oxidation

Air sparge / Soil vapor extraction

Natural Attenuation

Excavate and offsite disposal

If Yes: Estimated Volume (Cubic Yards)

Name of Licensed Disposal Facility or COGCC Facility ID #

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.

## **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 \_\_\_\_\_

### **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: \_\_\_\_\_

# 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.

Following below ground cut-off of wellhead, the excavation will be backfilled to grade and reseeded with landowner approved seed mix.

Is the described reclamation complete? \_\_\_\_\_

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. 04/05/2022

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/09/2022

Proposed site investigation commencement. \_\_\_\_\_

Proposed completion of site investigation. 05/13/2022

## REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/18/2022

Proposed date of completion of Remediation. 05/20/2022

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**

This 1956 well was production tested but was apparently never connected to production facilities nor a pipeline and was never produced prior to its plug and abandonment in 1962. COGCC inspections in 2003, 2019 & 2020 noted that the well was venting a slight amount of gas. The well is in the COGCC's orphan well program and is to be re-entered in order to drill out the inadequate upper plugs and re-plug to current standards before installing a below ground dry-hole plate and reseeding with landowner approved seed mix.

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

Signed: Reed Fischer

Title: Engineering Advisor

Submit Date: 04/12/2022

Email: rfischer@catamountep.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: 04/13/2022

Remediation Project Number: 22782

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

	This Site Investigation and Remediation Workplan (Form 27) is conditionally approved; however, additional information or activities may be required during the course of remediation.
	Final Reclamation should comply with 1004 rules.
	If fluids are encountered during the PA process, samples will be collected and analyzed for the constituents listed in Rule 615.e.(2).
	Per Rule 915.e.(2).B: Samples will be collected from areas most likely to have been impacted, and the horizontal and vertical extent of contamination will be determined. The number and location of samples will be appropriate to determine the horizontal and vertical extent of the impact.
	Per 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. The Quarterly reporting schedule box has been checked by the reviewer.

5 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**

402998361	FORM 27-INITIAL-SUBMITTED
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Total Attach: 1 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)