

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
403019880
Receive Date:
04/19/2022
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: SIMCOE LLC	Operator No: 10749	Phone Numbers
Address: 1199 MAIN AVE SUITE 101		Phone: (970) 852-5172
City: DURANGO State: CO Zip: 81301		Mobile: (970) 769-9523
Contact Person: Sabre Beebe	Email: sabre.beebe@ikavenergy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22776 Initial Form 27 Document #: 403010188

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: 481402	API #:	County Name: LA PLATA
Facility Name: Piccoli A 1 discharge line	Latitude: 37.170083	Longitude: -107.792092	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWSE	Sec: 23	Twp: 34N	Range: 9W Meridian: M Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Agriculture
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

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	~0.5 acre	Sampling and measurement during response

INITIAL ACTION SUMMARY

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

Well and line were shut in and isolated. Water truck dispatched to location. Wattles installed on slop and at culvert leading to creek and other areas. Hydrovac truck recovered free standing water below fill slope and water truck recovered water on well pad.

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):

Sampling performed previously and submitted via supplemental form 19

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):

Surface water sampling was performed during response to release and submitted via form 19

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 6
 Number of soil samples exceeding 915-1 4
 Was the areal and vertical extent of soil contamination delineated? Yes
 Approximate areal extent (square feet) 25182

ND Highest concentration of TPH (mg/kg) _____
 -- Highest concentration of SAR 13.5
 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) _____
 Number of groundwater monitoring wells installed _____
 Number of groundwater samples exceeding 915-1 _____

ND Highest concentration of Benzene (µg/l) _____
 ND Highest concentration of Toluene (µg/l) _____
 ND Highest concentration of Ethylbenzene (µg/l) _____
 ND Highest concentration of Xylene (µg/l) _____
 ND Highest concentration of Methane (mg/l) _____

Surface Water

2 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?
 Produced water traveled off well pad and down the fill slope onto non-disturbed area

Were background samples collected as part of this site investigation?
 Background sampling conducted to the northeast of the well pad

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.
 SAR to be remediated insitu

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.
 Remediation of elevated SAR will be performed insitu by applying a combination of soil amendments and inter-seeding with Phyto remedial grass seeds. Seeding and amendment treatment is planned to be executed no later than May 30, 2022 weather permitting. Monitoring with soil sampling will be performed following the monsoon season 2022 and annually thereafter until such time that soil sample values are below the threshold. Soil samples will be analyzed for SAR, EC and pH as SAR results from initial sampling are elevated.

Soil Remediation Summary

In Situ Ex Situ
 Yes _____ Bioremediation (or enhanced bioremediation) _____ Excavate and offsite disposal
 _____ Chemical oxidation _____ If Yes: Estimated Volume (Cubic Yards) _____
 _____ Air sparge / Soil vapor extraction _____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation
Yes Other phytoremediation in addition to
_____ soil amendments

_____ 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.

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? 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? 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.

There will be no change in the grade of the land as in-situ remediation will be performed by utilizing liquified soil amendments and phytoremediation with Western Wheatgrass, Alkali Sacaton, and Beardless Wildrye seed mix to aid in salt remediation in the soils.

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? No _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? No _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/15/2022

Proposed date of completion of Reclamation. 06/30/2022

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. 01/11/2022

Actual Spill or Release date, or date of discovery. 01/11/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/11/2022

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/15/2022

Proposed date of completion of Remediation. 06/30/2022

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

Justification for date change. Ranch Manager has approved remediation plan, but requested the work be delayed to June when the cattle will be removed from this pasture to a different pasture.

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

Signed: Sabre Beebe

Title: Environmental Coordinator

Submit Date: 04/19/2022

Email: sabre.beebe@ikavenergy.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: 04/19/2022

Remediation Project Number: 22776

Condition of Approval

COA Type

Description

<u>COA Type</u>	<u>Description</u>
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

403019880	FORM 27-SUPPLEMENTAL-SUBMITTED
-----------	--------------------------------

Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

Environmental	Per Rule 913.d.(2), the operator has requested to modify the implementation schedule to accommodate the ranch manager's request. The COGCC approves this modification.	04/19/2022
---------------	--	------------

Total: 1 comment(s)