

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402980487

Receive Date:

03/16/2022

Report taken by:

ALEX FISCHER

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: CHEVRON USA INC	Operator No: 16700	Phone Numbers
Address: 760 HORIZON DRIVE STE 401		
City: GRAND JUNCTION State: CO Zip: 81506		
Contact Person: Doug Sparks	Email: DVVZ@chevron.com	
		Phone: (970) 5605998
		Mobile: (970) 5605998

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22938 Initial Form 27 Document #: 402980487

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: WELL	Facility ID: _____	API #: 103-05841	County Name: RIO BLANCO
Facility Name: WILSON CREEK UNIT 38	Latitude: 40.169692	Longitude: -107.899017	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 2	Twp: 2N	Range: 94W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Forest

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

Location is located within a High Priority Habitat Area.

SITE INVESTIGATION PLAN**TYPE OF WASTE:**☒ **E&P Waste**☐ **Other E&P Waste**☒ **Non-E&P Waste**☒ **Produced Water**☐ **Workover Fluids**

No wastes currently known on location.

☐ **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	VEGETATION	Well site was cleared and graded.	Satellite imagery

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 plug and abandonment scheduled to begin 5/9/22. Site reclamation to follow.

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):

Discrete soil samples shall be collected from the wellhead location, and any impacts at depth will be documented and remediated. Additionally, discrete soil samples shall be collected per Rule 915.e.(2).B, such as where the on-location flow line will be abandoned and beneath any associated equipment on location. The number and location of samples will be appropriate to determine the horizontal and vertical extent of the impact. Collected soil samples will be analyzed for Table 915-1 Cleanup Concentrations using the Protection of Groundwater Screening Level Concentrations.

Proposed Groundwater Sampling

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

If groundwater is encountered during any excavation, a minimum of one groundwater sample shall be collected per Rule 913.c.(6) for those constituents listed in Table 915-1.

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? No

Approximate areal extent (square feet)

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1 No

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?

Operator shall collect sample(s) from comparable, nearby non-impacted native soil for purposes of establishing background soil conditions.

☐ 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.

If any impacts are identified during the well P&A and closure of associated facilities, the contaminated soil will be excavated and hauled to an authorized disposal facility.

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 any impacts are identified during the well P&A and closure of the associated facilities, the contaminated soil will be excavated and hauled to an authorized disposal facility. If groundwater is encountered during any excavation, a minimum of one groundwater sample shall be collected per Rule 913.c.(6) for those constituents listed in Table 915-1. Pursuant to Rule 913.h.(1).A, demonstration of compliance with Table 915-1 cleanup concentration is required for closure of this remediation project.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

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

_____ Excavate and onsite remediation

_____ Other _____

_____ 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.

N/A

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly

☐ Semi-Annually

☐ Annually

☒ Other

A supplemental Form 27 will be submitted within 45 days of the completion of the actions described.

☐ **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: _____

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 is to be reclaimed for final abandonment following well plug and abandonment. Flowlines from well will be removed from pad location. Wellhead will be cut and capped below grade. Location will be recontoured to natural grade and revegetated with approved seed mixture in appropriate seeding season. Road adjacent to pad will remain in place until the full field abandonment project progresses to a point that the road is not longer in use. Road determinations to be made with BLM and relevant surface owners.

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. 06/06/2022

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. 07/29/2021

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.

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

Central Tank Battery Facility ID: 449641 (off-Location remote tank battery)

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

Signed: Rachel Puechner

Title: Decommissioning Advisor

Submit Date: 03/16/2022

Email: RPuechner@chevron.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: ALEX FISCHER

Date: 04/25/2022

Remediation Project Number: 22938

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

	Form 42 not found in well file for online flowline abandonments. Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements.
	Under Reclamation Plan: Final Reclamation shall comply with the BLMs standards and guidelines. Consult with the BLM regarding interim and/or final reclamation. Reseeding with species consistent with the adjacent plant community is encouraged. The Operator will use a seed mixture requested by the surface owner. In the absence of an agreement between the operator and the affected surface owner as to what seed mix should be used, the operator shall consult with a representative of the local soil conservation district to determine the proper seed mix to use in revegetating the disturbed area. A Bureau of Land Management approved seed mix specific to the ecological site would also be acceptable.
	Sampling of inorganics will occur as part of the 915-1 evaluation to demonstrate the contamination of soils due to E&P waste within the root zone. Root zone depth will be determined by the Operator and approved by COGCC. Sampling should occur at discrete intervals in potentially impacted areas with comparable discrete samples in reference areas.
	All risers associated with the Wilson Creek Unit, including both flowline and gathering line risers must be removed per 1004 Rules.
	Doc #402985106, Soil Sample Location Map: Discrete soil samples at flowline locations shall be collected and analyzed for Table 915-1 Cleanup Concentrations using the Protection of Groundwater Screening Level Concentrations at the cut and cap leading off location and at the well head or facility terminus.
	Should historic impact be discovered during P&A and/or Reclamation activities, the operator must investigate the extent of release and provide Form 19 and a supplemental Form 27 with proposed investigation sample sites for COGCC staff approval.
	See COA on the Form 6 (Document # 402950204) states: This oil and gas location is within a CPW mapped Elk Production area. CPW recommends that plugging and abandonment (PA) activities should not take place from May 15 to June 30. If operations must take place from May 15 to June 30, operator will consult with CPW to determine site-specific measures to avoid, minimize, and mitigate adverse impacts to wildlife and the environment.
	Submit a separate Form 27 for the off-location flowline (WC2 Multiphase Fluid Production System) present (Lat/Long 40.196434/-107.918737); Facility ID #481870. Provide the corrected Lat/Long coordinates for the proposed sample locations on the Form 27. Form 44 not found in well file for offline flowline abandonment. Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements.
	Site Investigation Plan: Collect a discrete soil sample from the Pig Station facility, in addition to the discrete soil samples planned for the wellhead, on-location flowline, and chemical tote locations, illustrated on Attached Soil Sample Location Map.

	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.
10 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

402980487	FORM 27-INITIAL-SUBMITTED
402985106	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	The remote Central Tank Battery Facility ID: 449641 shall be addressed under a separate Form 27.	04/13/2022
Environmental	Under Site Investigation Report, "BTEX >915-1" is checked "NO", however no samples have been collected yet.	04/13/2022
Environmental	<p>The following was listed in the Form 19 Doc #1395580, Resolved 8/24/06: A leak occurred in a 3" pipe approximately 1800 yards south of well. The cause of the leak was freezing of liquids in a low spot in the line. The line had been idle since January. A visual inspection was made but the damage was not detected until fluid was turned back into it. Approximately 8 BBLs of brine water and 2 BBLs of oil were released. All fluids were contained in the field. No impact to surface water. Time required for control of event approximately 15 minutes.</p> <p>The following was listed under the F19 Immediate Response: The line was shut in immediately upon detection. Vacuum trucks removed all of the free fluid; estimated recovery is approximately 7 BBLs of brine water and 1.75 BBLs oil. The fluids were taken to the truck unloading facility at the MWP. 40 FEET OF THE LINE WAS REPLACED.</p>	04/12/2022
Environmental	<p>Environmental Soil Survey NRCS: Jerry-Thornburgh-Rhone complex, 8-65% slopes; Map Unit 45 FED/FED Riverine Wetlands located greater than 1,000 feet of the WC #38. Location is in a High Priority Habitat for: Elk Production Area Surface Casing depth reported to be 944 ft. Off-location flowline info: WC2 Multiphase Fluid Production System, 4" carbon steel, 13,392 feet segment length Doc #402763998 is the Operator's Letter of Intent and proposed implementation schedule Wilson Creek Field, field wide</p>	04/06/2022
Environmental	<p>Environmental Inspection Doc #700402561 under Ancillary equipment states, "Chemical container"</p> <p>Inspection Doc #679706000 states, "Container of RE9306WCW with secondary containment" and "Producing well on subpump"</p> <p>Inspection Doc #675102984 states, "No tank battery on location", "Chem tote w/secondary containment", and "PR - no leaks/venting"</p> <p>Inspection Doc #675100421 indicates equipment (Pig Station 4, Deadman # & Marked, and Submersible Pump) as satisfactory.</p> <p>No corrective actions were identified in the Inspection reports, and none of the Inspection Photos indicate discolored/stained soil.</p>	04/06/2022
Environmental	COGCC checked E&P Waste on the Site Investigation Tab.	04/06/2022

Total: 6 comment(s)