

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:

403099230

Receive Date:

07/08/2022

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	Phone Numbers
Address: 1001 17TH STREET #1600		
City: DENVER State: CO Zip: 80202		
Contact Person: Blair Rollins	Email: brollins@caerusoilandgas.com	
		Phone: (970) 285-2925
		Mobile: (970) 640-6919

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18560 Initial Form 27 Document #: 402713247

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: 480103	API #: _____	County Name: GARFIELD
Facility Name: Texaco Fee 6214 Tank Overflow	Latitude: 39.534532	Longitude: -108.463857	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 17	Twp: 6S	Range: 99W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GM Most Sensitive Adjacent Land Use Riparian area

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? No

Other Potential Receptors within 1/4 mile

The domestic water well is located approximately 2,350 feet south of the location. The surface water is located approximately 1,500 feet west of the 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 analysis

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 number 402708407 for initial response measures for the project.

Additionally, Caerus moved the tank to assess the extent of contamination associated with the project. Following tank removal, Caerus excavated approximately 72 cubic yards of impacted soil for offsite disposal at Greenleaf Environmental Services outside of DeBeque, Colorado.

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):

Based on the soil boring results included in the Q2 2021 REM update, Caerus plans to excavate and stage the impacted soil on location for assessment and characterization. All impacted soil will be staged on the location for assessment and confirmation soil samples will be collected from the side walls and bottom of the excavation to demonstrate compliance with COGCC Table 915-1 standards.

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 during the excavation and confirmation of this project, Caerus will immediately contact the COGCC and 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):

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 74

Number of soil samples exceeding 915-1 71

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

Approximate areal extent (square feet) 900

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) 350

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 915-1 0

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.

NA / ND

-- Highest concentration of TPH (mg/kg) 34460

-- Highest concentration of SAR 15.6

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 22

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA 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?

Caerus proposes to collect additional background soil samples from the area to compare to COGCC Table 915-1 SSR standards.

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 72

Volume of liquid waste (barrels) 0

☐ Is further site investigation required?**REMEDIAL ACTION PLAN**

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Caerus has conducted manual excavation remediation of the spill area and staged the spoils pile onsite for characterization and remediation. Caerus has characterized the excavation through soil sampling to demonstrate removal of hydrocarbon impacts from the spill area.

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.

Approximately 2,000 cubic yards of impacted spoils are staged on the location to be treated onsite through manual shredding and chemical/biological treatment for hydrocarbons. The proposed chemicals for treatment are included as attachments labeled "NOVO Biological 1 page" and "NOVO Chemionyx 1 page" and will be applied to the pile before and during shredding. The spoils pile will be located inside a dirt bermed containment, and 500 cubic yard batches of the spoils pile will be treated at a time. The treatment timeline per 500 yard batch should be approximately 2 to 3 weeks to allow for chemical treatment and shredding to successfully remediate the hydrocarbon impacts from the spoils pile. Caerus proposes one five-point composite sample to be analyzed for the complete list of Table 915-1 to determine compliance for each 500 cubic yard batch of spoils. Following confirmation sampling to demonstrate COGCC Table 915-1 compliance within each 500 cubic yard spoils batch, Caerus proposes to return each spoils pile batch to the excavation to allow for the next spoils pile batch treatment.

Following successful completion of spoils pile treatment on the well pad surface, Caerus will collect confirmation samples from the pad surface at a rate of one grab sample per 500 cubic feet of spoils treatment pile surface area to ensure residual contaminants did not migrate into the active pad surface during staging and storage.

Caerus proposes to collect additional background soil samples from native non-impacted background areas to determine site specific background concentrations for the SSR and metals constituents found in Table 915-1.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 0

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

Yes _____ Excavate and onsite remediation

_____ Other _____

Yes _____ Land Treatment

Yes _____ Bioremediation (or enhanced bioremediation)

Yes _____ Chemical oxidation

No _____ 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.

Groundwater impacts have not been identified associated with this project. If future investigation activities identify impacts to groundwater, Caerus will submit supplemental documentation to provide scope and monitoring of impacted groundwater.

REMEDATION 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 Q2 REM Update and Proposed Land Treatment

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Per Rule 705.b, and in line with guidance laid out in the SBAP, Caerus has general liability insurance in the amount of \$1M, and Caerus has umbrella insurance, which sits over the general liability insurance in the amount of \$75M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$76M.

Operator anticipates the remaining cost for this project to be: \$ _____

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:

Condensate impacted soil was excavated from the secondary containment area and transported to Greenleaf Environmental Services outside of DeBeque, Colorado for offsite disposal. No beneficial use of this material is proposed.

Volume of E&P Waste (solid) in cubic yards _____ 72

E&P waste (solid) description _____ Condensate impacted soil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Offsite disposal at Greenleaf Environmental Services

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

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.

Caerus will follow COGCC 1000 series regulations for final site reclamation at the end of the life of the facility.

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? No _____

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). _____

Proposed site investigation commencement. 06/08/2021

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/19/2022

Proposed date of completion of Remediation. 10/12/2022

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

The proposed chemicals for treatment are included as attachments labeled "NOVO Biological 1 page" and "NOVO Chemionyx 1 page" and will be applied to the pile before and during shredding.

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: 07/08/2022

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 Arauza

Date: 07/08/2022

Remediation Project Number: 18560

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

	Any accumulation of fluid in treatment area shall be removed upon detection. Treatment area shall monitored after any significant precipitation event.
	Comply with Rule 905.e.(2) requirements for Land Treatment of Oily Waste.
	Provide updated cost estimate via a Supplemental Form 27.
	Collect composite sample aliquots from areas most likely to be impacted, per Rule 915.e.(2).B.
4 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**

403099230	FORM 27-SUPPLEMENTAL-SUBMITTED
403099340	MAP
403099341	REMEDIAL ACTION PLAN
403099342	REMEDIAL ACTION PLAN
403099345	ANALYTICAL RESULTS
403099346	ANALYTICAL RESULTS

Total Attach: 6 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)