

**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:  
403128716

Receive Date:  
08/08/2022

Report taken by:  
BOB CHESSON

**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>	<b>Phone Numbers</b>
Address: <u>555 17TH ST STE 3700</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Phone: <u>(303) 2947864</u>
	Zip: <u>80202</u>	Mobile: <u>(303) 8293811</u>
Contact Person: <u>Jacob Evans</u>	Email: <u>jevans@civiresources.com</u>	

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 23378 Initial Form 27 Document #: 403063125

**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**

Yes  Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>450230</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Peterson Production Pad 5-63-30 SWNE</u>		Latitude: <u>40.373444</u>	Longitude: <u>-104.476803</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWNE</u>	Sec: <u>30</u>	Twp: <u>5N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>481665</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Peterson 5-63-30 SWNE</u>		Latitude: <u>40.373442</u>	Longitude: <u>-104.476786</u>
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: <u>SWNE</u>	Sec: <u>30</u>	Twp: <u>5N</u>	Range: <u>63W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications GP

Most Sensitive Adjacent Land Use Cropland

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 located within HPH  
Pond - ~0.22 miles northwest  
Riverine - ~0.25 miles north

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water       | <input type="checkbox"/> Workover Fluids             | _____                                  |
| <input checked="" type="checkbox"/> Oil       | <input type="checkbox"/> Tank Bottoms                |  |
| <input type="checkbox"/> Condensate           | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids      | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings       | <input type="checkbox"/> Spent Filters               |  |
|   | <input type="checkbox"/> Pit Bottoms                 |  |
|   | <input type="checkbox"/> Other (as described by EPA) | _____                                  |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	20'x15'x1.5'	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.

Extremely low temperatures caused an automated fitting on the LACT unit to freeze in the "open" position, resulting in approximately 5 bbls of oil being released to the ground surface. The unit was repaired and the impacted soil was removed and hauled to a COGCC disposal facility.

## 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 ):

One (1) waste characterization sample for full COGCC Table 915-1 analysis (TPH (C6-C36), Table 915-1 organics in soil, metals, EC, SAR, pH, and Boron) was collected prior to soil removal. Six (6) initial grab samples were collected following the release clean-up for TPH (C6-C36) and Table 915-1 organics in soil per a COGCC approved sampling plan. 11 additional grab soil samples were collected following over-excavation of residual soil impacts for TPH (C6-C36) and organics in soil. Additional grab soil samples will be collected from further excavation activities for TPH (C6-C36) and Table 915-1 organics in soil. All samples collected were/will be analyzed by a certified laboratory using approved COGCC laboratory analysis methods.

### 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

<b>Soil</b>	<b>NA / ND</b>
Number of soil samples collected <u>19</u>	-- Highest concentration of TPH (mg/kg) <u>7904</u>
Number of soil samples exceeding 915-1 <u>8</u>	-- Highest concentration of SAR <u>1.74</u>
Was the areal and vertical extent of soil contamination delineated? <u>No</u>	BTEX > 915-1 <u>Yes</u>

Approximate areal extent (square feet) 300

Vertical Extent > 915-1 (in feet) 2

**Groundwater**

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) \_\_\_\_\_

Depth to groundwater (below ground surface, in feet) \_\_\_\_\_

Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed \_\_\_\_\_

Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 \_\_\_\_\_

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?

One (1) background sample was collected for inorganics and metals in soil comparison with the waste characterization sample. All inorganics were in compliance with COGCC Table 915-1, and the metals are in compliance with COGCC Table 915-1 residential soil screening levels and/or background comparison (see Arsenic).

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

Volume of solid waste (cubic yards) 10

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? No

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

The source will be removed through excavation of impacted soil. BCEOC proposes an amended analysis plan to include TPH C6-C36) and Table 915-1 organics in soil. BCEOC also proposes to continue utilizing the residential soil screening levels due to the surficial nature of the release and immediate clean-up response.

**REMEDICATION 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.

Source removal will be completed prior to July 1, 2022. Confirmation soil samples from additional soil removal activities will be collected. Once confirmation soil samples meet COGCC Table 915-1 regulatory limits, and NFA designation will be requested. If residual soil impacts exceed COGCC Table 915-1 regulatory limits and additional soil cannot be removed, alternative remedial technologies will be investigated and proposed in a supplemental report.

**Soil Remediation Summary**

In Situ

Ex Situ

         Bioremediation ( or enhanced bioremediation )

         Yes          Excavate and offsite disposal

         Chemical oxidation

         If Yes: Estimated Volume (Cubic Yards) 10

         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**

\_\_\_\_\_ 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 Release assessment summary

## 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.

The General Liability coverage within the Civitas Resources insurance program includes coverage for bodily injury, property damage, and pollution clean-up costs arising from qualifying pollution events of a sudden and accidental nature subject to a \$1,000,000 per occurrence limit and \$2,000,000 aggregate limit. The Civitas Resources insurance program includes Excess Liability coverage of \$110,000,000 per occurrence and in the aggregate which sits over the sudden and accidental pollution within the General Liability coverage. It is the opinion of Civitas Resources that this total tower of limit is adequate to address the costs of remediation associated with any qualifying pollution event.

Operator anticipates the remaining cost for this project to be: \$ 10000

## 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 10

E&P waste (solid) description E&P solid waste derived from excavation activities

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: Buffalo Ridge

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description \_\_\_\_\_

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: \_\_\_\_\_

## REMEDIATION COMPLETION REPORT

### REMEDIATION 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? No

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

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 will be completed in accordance with COGCC 1000 series rules at a later date.

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. 03/23/2022

Actual Spill or Release date, or date of discovery. 03/23/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/23/2022

Proposed site investigation commencement. 03/25/2022

Proposed completion of site investigation. 07/01/2022

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/23/2022

Proposed date of completion of Remediation. 10/03/2022

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:

Excavation of impacted material was rescheduled.

**OPERATOR COMMENT**

Update to schedule

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

Signed: Jacob EvansTitle: Environmental AdvisorSubmit Date: 08/08/2022Email: jevans@civiresources.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: BOB CHESSONDate: 08/08/2022Remediation Project Number: 23378**Condition of Approval****COA Type****Description**

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**

403128716

FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 1 Files

**General Comments****User Group****Comment****Comment Date**Stamp Upon  
Approval

Total: 0 comment(s)