

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

403147293

Receive Date:

09/01/2022

Report taken by:

Steven Arauza

## 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: <u>VISION ENERGY LLC</u>	Operator No: <u>10770</u>	<b>Phone Numbers</b>
Address: <u>P O BOX 370</u>		Phone: <u>(970) 5634000</u>
City: <u>IGNACIO</u> State: <u>CO</u> Zip: <u>81137</u>		Mobile: <u>(970) 7599545</u>
Contact Person: <u>Trish Harrison</u>	Email: <u>trishharrison@eis-llc.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 24912 Initial Form 27 Document #: 403147293

#### 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: <u>LOCATION</u>	Facility ID: <u>322436</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>BALDY CREEK-FEDERAL-67S90W 20NWNE</u>	Latitude: <u>39.435293</u>	Longitude: <u>-107.462296</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>20</u>	Twp: <u>7S</u>	Range: <u>90W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

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

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

## 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	TBD	Sampling

### INITIAL ACTION SUMMARY

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

Soil and water samples taken on location. Soil in the immediate impact area was removed (approx 8 gallons of soil).

### 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 ):

Samples to be taken from cutslope where it is possible that produced water left the pad, as well in the roadside diversion ditch to delineate point of compliance with the full suite of analytes found in the COGCC table 915-1 using the protection of groundwater criteria. Attached is the map of sampling points.

#### 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 ):

Grab samples from downgradient and upgradient of West Fork of Baldy Creek.

### 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 3

Number of soil samples exceeding 915-1 1

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 10

-- Highest concentration of TPH (mg/kg) 192.1

-- Highest concentration of SAR 10.3

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 1

#### 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

2 Number of surface water samples collected

1 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?

☐ 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.

Initial source of contamination was produced water. Discolored soil around the wellhead was removed. Additional soil will be removed as sampling indicates necessary.

### 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.

Initial soil samples came back with the sample point 1 at the edge of the pad with Table 915-1 (GW Protection) thresholds exceeding in Benzene and trimethylbenzene.

The plan forward is as follows:

Sample to determine the distal end of flow down the diversion ditch to prove point of compliance. Once point of compliance is determined, potholing will be done to determine vertical and horizontal extent. Then soil will be removed and replaced as necessary. Sampling will be done on any surface water on location.

### 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

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ 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

### 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.

Financial assurance is adequate to address the anticipated costs of remediation and reclamation. Cost TBD based on sample results.

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:

No beneficial use -  
.04 cubic yards of soil was taken to the Fruita yard.

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

E&P waste (solid) description Soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Fruita yard

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.

TBD

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. 08/12/2022

Actual Spill or Release date, or date of discovery. 06/01/2022

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/02/2022

Proposed site investigation commencement. 09/14/2022

Proposed completion of site investigation. 09/30/2022

## REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/01/2023

Proposed date of completion of Remediation. 06/30/2023

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**

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

Signed: Trish Harrison

Title: Permitting

Submit Date: 09/01/2022

Email: trishharrison@eis-llc.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: 09/09/2022

Remediation Project Number: 24912

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

	Submit Supplemental eForm 19 to request closure of Spill/Release ID #482408. Supplemental report shall comply with outstanding COAs, indicate that work is proceeding under an approved eForm 27 and shall reference the Remediation Project number assigned upon approval of this report.
	Operator shall collect soil samples from areas most likely to be impacted and shall collect an appropriate number of representative soil samples to delineate the horizontal and vertical extents of contamination, per Rule 915.e.(2).B.
	Operator shall collect sample(s) from comparable, nearby non-impacted native soil for purposes of establishing background soil conditions including pH, electrical conductivity (EC) and sodium adsorption ratio (SAR), per Rule 915.e.(2).D.
	Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater. The Operator shall analyze samples for the complete Table 915-1 list and shall compare analytical results for site investigation samples to both the Table 915-1 Residential Soil Screening Level Concentrations and the Protection of Groundwater Soil Screening Level Concentrations. Submit an assessment of potential pathways to groundwater via a Supplemental Form 27.

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**

403147293	FORM 27-INITIAL-SUBMITTED
403152198	ANALYTICAL RESULTS
403152392	ANALYTICAL RESULTS
403153855	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

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

Environmental	Additional soil sampling locations may be required based on input from the BLM regarding the original spill path.	09/09/2022
Environmental	COGCC updated Sample Summary to reflect analytical data provided in attached doc #403152198.	09/09/2022

Total: 2 comment(s)