

State of Colorado
Oil and Gas Conservation Commission

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403129330
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08/09/2022

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		Phone: (970) 285-2925
City: DENVER State: CO Zip: 80202		Mobile: (970) 640-6919
Contact Person: Blair Rollins	Email: brollins@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 15973 Initial Form 27 Document #: 402490446

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: 477097	API #: _____	County Name: GARFIELD
Facility Name: Unocal 1 dumpline release	Latitude: 39.519440	Longitude: -108.122330	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 16	Twp: 6S	Range: 96W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Non-crop land
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? Yes

Other Potential Receptors within 1/4 mile

Groundwater at the site was documented to be 8.98' below ground surface within SVE05 during the quarterly dewatering and monitoring event. The nearest dry drainage is located adjacent to the well pad to the north. The nearest surface water is approximately 2,320 feet west of the site. Nearest downgradient groundwater well is located approximately 5,830 feet south of the site.

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	GROUNDWATER	TBD	Laboratory analytical results
Yes	SOILS	TBD	Laboratory analytical results

INITIAL ACTION SUMMARY

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

Upon discovery of the spill, Caerus shut in the wells to stop the release. Caerus utilized manual excavation to determine if the extents of contamination could be identified for the release. Soil samples were collected to verify compliance with COGCC Table 910-1 standards for the project. With the identification of groundwater at the site, the project is now subject to remediation to COGCC Table 915-1 standards.

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):

Soil samples were collected during soil boring installation adjacent to the point of release and are outlined in the attached report of work completed.

Proposed Groundwater Sampling

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

Groundwater was encountered during soil boring installation near the point of release. Groundwater samples were collected as part of the assessment activities and are included within the attached report of work completed.

Proposed Surface Water Sampling

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

[Empty box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Caerus is preparing a proposal for additional groundwater monitoring wells to determine the lateral extent of groundwater contamination associated with the project.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

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) 5000

NA / ND

NA Highest concentration of TPH (mg/kg) _____
NA Highest concentration of SAR _____
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 22

Groundwater

Number of groundwater samples collected 8
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 17
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 8

-- Highest concentration of Benzene (µg/l) 2590
-- Highest concentration of Toluene (µg/l) 25.9
-- Highest concentration of Ethylbenzene (µg/l) 342
-- Highest concentration of Xylene (µg/l) 2330
NA Highest concentration of Methane (mg/l) _____

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.

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?

Additional site investigation is required to determine the vertical and horizontal extent of contamination associated with the project.

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 been conducting quarterly enhanced fluid recovery activities at the site to address and remove impacts to groundwater at the site. Once the extent of contamination is determined, Caerus will provide a plan for source removal to the COGCC for review.

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.

Caerus is in the process of determining effective remediation strategies at the site. When groundwater is present within the quarter, Caerus will conduct a dewatering event prior to collecting groundwater samples. When groundwater is not present within the quarter, Caerus will conduct a powered-trailer SVE event to determine the radius of influence of SVE wells within the project area. Following radius of influence determination, the powered-trailer SVE event will also support the remediation of soil impacts within the area and provide makeup air to the subsurface soils.

Soil Remediation Summary

In Situ

Ex Situ

Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Yes Air sparge / Soil vapor extraction
 Yes Natural Attenuation
 Other _____

Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____
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

No Bioremediation (or enhanced bioremediation)
 No Chemical oxidation
 Yes Air sparge / Soil vapor extraction
 Yes Natural Attenuation
 Yes Other Dewatering and monitoring _____

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.

Caerus plans to continue quarterly dewatering activities at the site when groundwater is present in the monitoring wells. The attached report of work completed reports quarterly dewatering of the site, and groundwater sample results for Q2 2022. Caerus will continue to conduct these activities on a quarterly basis.

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 Q2 2022 REM update

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: \$ 75000

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:

Dewatering activities during the second quarter of 2022 recovered approximately 25 gallons (0.5) barrels of fluid. The liquid was transported to the NPR Solidification Facility for handling and disposal.

Volume of E&P Waste (solid) in cubic yards 0

E&P waste (solid) description

COGCC Disposal Facility ID #, if applicable: 428910

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels 1

E&P waste (liquid) description Impacted groundwater from monitoring wells onsite.

COGCC Disposal Facility ID #, if applicable: 428910

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? _____

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 anticipates the extent of contamination will be contained to the active well pad surface. Caerus plans to backfill the excavation to the active working surface of the well pad for continued operation.

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? _____

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. 07/22/2020

Proposed completion of site investigation. 11/17/2020

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/21/2021

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

Caerus will continue to conduct quarterly enhanced fluid recovery (EFR) events prior to sample collection to determine the effectiveness of EFR for source removal and remediation of the project.

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: 08/09/2022

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: 09/09/2022

Remediation Project Number: 15973

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

	<p>Attached analytical results for soil samples (doc #403130071) document Table 915-1 Protection of Groundwater Soil Screening Level Concentrations for: TPH, BTEX, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 1-methylnapthalene, 2-methylnapthalene, napthalene, EC, SAR, pH, boron, arsenic, barium, cadmium, chromium (VI), lead, and selenium.</p> <p>Per Rule 913.b.(2), Operator will conduct soil sampling and analysis to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1.</p> <p>Per Rule 913.b.(5).A, Operator will perform remediation in a manner that reduces or removes contamination that exceeds the cleanup concentrations in Table 915-1.</p> <p>Operator will address Table 915-1 exceedances for Soil Suitability for Reclamation criteria and Metals in Soils on a Supplemental Form 27.</p>
1 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**

403129330	FORM 27-SUPPLEMENTAL-SUBMITTED
403129396	REMEDATION PROGRESS REPORT
403130071	ANALYTICAL RESULTS

Total Attach: 3 Files

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

Environmental	See doc #403129350 for additional COAs and comments.	09/09/2022
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Total: 1 comment(s)