

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:

403173432

Receive Date:

09/26/2022

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: <u>LARAMIE ENERGY LLC</u>	Operator No: <u>10433</u>	Phone Numbers
Address: <u>1700 LINCOLN ST STE 3950</u>		
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		
Contact Person: <u>Matt Kasten</u>	Email: <u>mkasten@laramie-energy.com</u>	
		Phone: <u>(970) 9019007</u>
		Mobile: <u>(970) 9019007</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22772 Initial Form 27 Document #: 402963156

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>335203</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>CC 0697-16D Pad</u>	Latitude: <u>39.516896</u>	Longitude: <u>-108.222768</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>16</u>	Twp: <u>6S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>481628</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>697-16D Tank Battery Failure</u>	Latitude: <u>39.516523</u>	Longitude: <u>-108.223356</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>16</u>	Twp: <u>6S</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications GC

Most Sensitive Adjacent Land Use non crop land

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

Dry drainage (Stormwater dependent) located ~200' south of site. Elevation from working surface ~7,005' and elevation of dry drainage ~6,825' (180' difference). It is assumed groundwater at site and failure point is greater than 20'. A drill rig is scheduled to begin delineation and correct data will be collected during assessment.

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	soil 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.

A scheduled loadout from 3rd party water truck driver was scheduled for 2/14/2022, and notified Laramie that no contents were within tanks. Field personnel arrived to inspect and found a leaking frost free valve was leaking inside lined secondary containment. Liner failure was identified and no free fluids were held within containment. Some residual condensate is being recovered from working surface but it is assumed a majority of the fluid is below the tank battery. Tank and containment removal is pending. Initial soil sample Chris, collected at point of release 2/15/2022 and will be analyzed for Table 915. Data collected from initial sampling is still pending and will be presented in supplemental form 27(s).

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):

1 soil sample was collected at surface point of release for 915 along with a surface water ~4.5 miles south of site (only location that surface water is present). During delineation samples will be field screened and sampled for 915. See attached Proposed drilling report and diagram for additional information on soil sampling proposal.

Proposed Groundwater Sampling

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

During drilling delineation; if groundwater is encountered it will be sampled and analyzed for 915. See attached drilling diagram for initial delineation proposal.

Proposed Surface Water Sampling

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

Surface water is being monitored daily ~ 4.5 miles from site (only present surface water). Initial sampling results are pending and will be presented when data is received, during initial sampling event no sheen or odor was noted. Surface water visualization will continue and if changes are noted a sample will be collected.

Additional Investigative Actions

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

See attached drilling proposal.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 18

Number of soil samples exceeding 915-1 1

NA / ND

-- Highest concentration of TPH (mg/kg) 7594

-- Highest concentration of SAR 40.7

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

BTEX > 915-1 Yes

Approximate areal extent (square feet) 2000

Vertical Extent > 915-1 (in feet) 1

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?

Backgrounds will be collected as part of this project.

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

Volume of solid waste (cubic yards) 822

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.

After drill delineation did not identify impacts below 20'bgs, source removal will begin with heavy equipment.

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.

Drilling delineation did not identify impacts beyond 20' bgs, excavation and disposal will occur or source area. Estimated NFA is late spring (April - May 2022).

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 822

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.

If groundwater is encountered during delineation, samples will be collected and analyzed for 915. TBD - after initial soil investigation.

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.

Based on the current COI provided by Acord, Laramie Energy has a total of \$16MM of sudden & accidental pollution. The primary layer in the General Liability Policy is \$1MM per occurrence and a \$15MM umbrella totaling \$16MM. Total estimate for project is ~ \$100,000 (sampling, drilling, disposal, backfill). Remaining cost for project will only be backfill (~\$15,000)

Operator anticipates the remaining cost for this project to be: \$ 15000

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:

NA

Volume of E&P Waste (solid) in cubic yards 822

E&P waste (solid) description soil with hydrocarbons

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Greenleaf

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

E&P waste (liquid) description na

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: na

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

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.

Reclamation will not be part of this project; if reclamation is needed, 1000 series rules will be followed.

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/15/2022

Proposed site investigation commencement. 03/07/2022

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

697-16D Condensate Spill (POR Source initial sample removed during excavation)

Laramie is requesting:

1. Project to remain under RSSL, groundwater well drilled below site (~250') discovered water at 92'. ~ 342' below release. Clearance sampling obtained at 20' bgs at site. MW1 is related to historical findings and not part of this project on pad surface (REM 25076). Borings utilized at surface did not get analyzed due to not finding release via PID. SB05 Identified release and operator determined best route was to excavate due to depth being shallow by PID screenings.
2. Consideration of Footnotes 1 and 11, arsenic identified in native soils above source areas.
3. Consideration of 913.e.2.c; operator knowledge report attached demonstrating inorganics that are present are not from release source.
4. Closure of REM 22772

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

Signed: Matt Kasten

Title: Project Manager

Submit Date: 09/26/2022

Email: mkasten@laramie-energy.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: 10/20/2022

Remediation Project Number: 22772

COA Type**Description**

	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if surface and/or ground water is found to be impacted, then further investigation and/or remediation activities will be required at the site. In addition, the non-working surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules including the establishment of vegetative cover on non-cropland and successful growth on cropland. Landowner must approve reclamation of cropland.
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**

403173432	FORM 27-SUPPLEMENTAL-SUBMITTED
403173434	ANALYTICAL RESULTS
403173435	SOIL SAMPLE LOCATION MAP
403173436	ANALYTICAL RESULTS
403173437	ANALYTICAL RESULTS
403173438	DISPOSAL MANIFESTS
403177240	LOGS
403177245	PHOTO DOCUMENTATION

Total Attach: 8 Files

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

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

Total: 0 comment(s)