

State of Colorado Oil and Gas Conservation Commission

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Report taken by:

ALEX FISCHER

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>OLD OPERATORS - STATUS UNKNOWN</u>	Operator No: <u>99999</u>	Phone Numbers Phone: <u>(970) 946-3761</u> Mobile: <u>()</u>
Address: <u>SEE COMMENT LINE IN WELL</u>		
City: <u>XXXXXXX</u>	State: <u>XX</u> Zip: <u></u>	
Contact Person: <u>Jacob Harter</u>	Email: <u>jharter@cottonwoodconsulting.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20500 Initial Form 27 Document #: 402704324

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: Plug and abandon well and decommission on site production equipment and flow line (s).

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: <u></u>	API #: <u>007-40034</u>	County Name: <u>ARCHULETA</u>
Facility Name: <u>Underwood Ditch (OWP) 2</u>		Latitude: <u>37.043380</u>	Longitude: <u>-106.839630</u>
		** correct Lat/Long if needed: Latitude: <u></u>	Longitude: <u></u>
QtrQtr: <u>SWNW</u>	Sec: <u>3</u>	Twp: <u>32N</u>	Range: <u>1E</u> Meridian: <u>N</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Grazing

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? Yes

Other Potential Receptors within 1/4 mile

Little Navajo River, irrigation ditch.

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
No	SOILS	None	Field screening, 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.

The COGCC Orphan Well Program plugged the Underwood Ditch (OWP) #2 well and decommissioned the well site during the fall of 2021. Soil, surface water, and wellbore fluid samples were collected in accordance with the Initial Form 27 for the project and COGCC Rule 915.e(2)B. No production equipment was located on the well site at the time of plugging and site decommissioning.

Two soil samples, including one background sample, were collected from the site; one was collected from the wellhead excavation and one was collected from nearby, non-impacted native soil. All soil samples were submitted for laboratory analysis of Table 915-1 constituents.

Baseline surface water samples were collected from the Little Navajo River upstream and downstream of the Underwood Ditch (OWP) #2. The surface water samples were submitted for laboratory analysis of Table 915-1 constituents.

Per the conditions of approval (COAs) noted in the Initial Form 27, a wellbore fluid sample was collected. The wellbore fluid sample was submitted for laboratory analysis of major anions, cations, TDS, BTEX, DRO, GRO, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and dissolved gasses (RSK 175).

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):

All areas suspected of having potential impacts, including the wellhead, were visually inspected and field screened with a PID. Using these observations and field screening results, soil samples were collected from areas most likely to be impacted.

One discrete soil sample was collected from the wellhead excavation. No production equipment was located on the well site at the time of plugging and site decommissioning. Soil samples were submitted for laboratory analysis of Table 915-1 constituents. The attached project map provides the location of all samples.

Proposed Groundwater Sampling

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

No groundwater or a pathway to groundwater was discovered during remediation activities; therefore, no groundwater samples were collected.

Proposed Surface Water Sampling

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

Baseline surface water samples were collected from the Little Navajo upstream and downstream of the Underwood Ditch (OWP) #2 well head prior to initial site disturbance. Water samples were analyzed for Table 915-1 constituents.

Additional Investigative Actions

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

Per the COAs noted in the Initial Form 27, a wellbore fluid sample was collected. The wellbore fluid sample was submitted for laboratory analysis of major anions, cations, TDS, BTEX, DRO, GRO, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and dissolved gasses (RSK 175).

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 2
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 0.69
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

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
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?

One representative background soil sample was collected for the project from nearby, non-impacted native soil. Laboratory results indicate that the arsenic concentration exceeded the COGCC standard.

Two baseline surface water samples were collected from the Little Navajo upstream and downstream of the Underwood Ditch (OWP) #2 well head prior to initial site disturbance. Both samples did not exceed the COGCC standard for any constituents.

☐ 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

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 well was plugged and the well site decommissioned during the fall of 2021. Soil, surface water, and wellbore fluid samples were collected in accordance with the Initial Form 27. Based on the soil sampling results, it appears that no additional remediation is needed at the site. Please refer to attached Results Tables, Maps, and Photographs.

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.

Based on the results of soil sampling conducted at the well site, no additional remediation is needed.

Soil Remediation Summary

☐ In Situ

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

☐ Ex Situ

_____ 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

_____ 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.

The wellbore fluid sample collected from within the casing of the Underwood Ditch (OWP) #2 well had a benzene concentration of 0.007 mg/L. During the project, a water sample was collected from the landowner's (Rempel) water well located approximately 75 feet west of the Underwood Ditch (OWP) #2 well. The water sample collected from the landowner's water well indicated no benzene above the laboratory detection limit. Based on this water sample data, it appears the benzene detected within the wellbore fluid sample of the Underwood Ditch (OWP) #2 has not impacted groundwater. Additionally, it is possible that the benzene detected in the Underwood Ditch (OWP) #2 well is associated with production fluids within the wellbore and not shallow groundwater within the area. Water well sample results are included in the attachments.

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 Facility closure

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 scope of work described in the in this Form 27 will be completed by the COGCC's orphan well program. the COGCC is not an operator and is performing remediation work on behalf the former operator.

Operator anticipates the remaining cost for this project to be: \$ 0

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

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

E&P waste (solid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

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? 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 be in accordance with COGCC 1000 Series Rules.

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? _____

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. 06/01/2022

Proposed date of completion of Reclamation. 09/30/2022

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). 07/05/2021

Proposed site investigation commencement. 09/01/2021

Proposed completion of site investigation. 12/01/2021

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

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

Signed: Jacob Harter

Title: Consultant

Submit Date: 06/14/2022

Email: jharter@cottonwoodconsulting.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: ALEX FISCHER

Date: 12/01/2022

Remediation Project Number: 20500

COA Type**Description**

	Final Reclamation shall comply with the COGCC 1000 Series Rules. Consult COGCC Reclamation Specialist regarding interim and/or final reclamation.
	Based on review of the information provided, it appears that no further action is necessary at this time and COGCC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.
	Under REM 20500 there is analytical data collected from the Rempel Ranch water well on 11/19/2021. Where is this water well in relation to the Underwood 2 location (007-40034)?
	A COA on the Form 27 Initial states that, "Discrete soil samples shall be collected and analyzed for Table 915-1 Cleanup Concentrations using the Protection of Groundwater Screening Level Concentrations." The analytical summary document submitted with this Form 27 Supplemental uses the Residential Soil Screening Level Concentrations from Table 915-1. Rule 915.e.(1).C requires that the analytical method selected "will have detection limits less than or equal to the cleanup concentrations in Table 915-1 and WQCC Regulation 41, as incorporated by reference in Rule 901.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**

402933569	FORM 27-SUPPLEMENTAL-SUBMITTED
402933614	SITE MAP
402933615	SITE MAP
402933616	ANALYTICAL RESULTS
402933618	ANALYTICAL RESULTS
402933619	ANALYTICAL RESULTS
402933620	PHOTO DOCUMENTATION
402933621	ANALYTICAL RESULTS
402933623	ANALYTICAL RESULTS
402933624	ANALYTICAL RESULTS
403074362	ANALYTICAL RESULTS
403074366	ANALYTICAL RESULTS

Total Attach: 12 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	It is stated that "No groundwater or a pathway to groundwater was discovered during remediation activities; therefore, no groundwater samples were collected."	12/01/2022
Environmental	Well bore fluid sample. Chloride* 1450 Total Dissolved Solids* 3770 Soil sample Arsenic 9.80; Background 7.84 x1.25 = 9.80	12/01/2022
Environmental	Attachment Doc #402933616 surface water sample from Navajo River Attachment Doc #402933618 soil sample at wellhead Attachment Doc #402933619 Well bore fluid sample analytical Attachment Doc #402933621 Table 1 soil sample results Attachment Doc #402933624 Table 3 base line water samples Attachment Doc #402933623 Table 2 well bore fluid sample Attachment Doc #403074362 Rempel Water Well Summary Table Attachment Doc #403074366 Rempel Water Well results	12/01/2022
Environmental	On the Remediation Completion Report tab, the "Compliant with Rule 913.h.(2)." and "Compliant with Rule 913.h.(3)." boxes have been unchecked by COGCC EPS staff, after review of the documentation submitted.	01/31/2022

Total: 4 comment(s)