

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403115711

Receive Date:

07/26/2022

Report taken by:

John Heil

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>TEP ROCKY MOUNTAIN LLC</u>	Operator No: <u>96850</u>	Phone Numbers
Address: <u>1058 COUNTY ROAD 215</u>		Phone: <u>(970) 263-2760</u>
City: <u>PARACHUTE</u> State: <u>CO</u> Zip: <u>81635</u>		Mobile: <u>(970) 623-4875</u>
Contact Person: <u>Michael Gardner</u>	Email: <u>mgardner@terraep.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 8576 Initial Form 27 Document #: 1733767

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: Historical spill closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: <u></u>	API #: <u>045-06747</u>	County Name: <u>GARFIELD</u>
Facility Name: <u>CLOUGH GV 25-27</u>	Latitude: <u>39.501611</u>	Longitude: <u>-107.873234</u>	
** correct Lat/Long if needed: Latitude: <u></u>		Longitude: <u></u>	
QtrQtr: <u>NWNE</u>	Sec: <u>27</u>	Twp: <u>6S</u>	Range: <u>94W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications OH Most Sensitive Adjacent Land Use CROP LAND

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

Surface water pond ~200 feet

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	GROUNDWATER	none	Monitor well installation & sampling
Yes	SOILS	~4,025 sq. feet x 7 ft. bgs	Excavation of the impacted area
No	SURFACE WATER	none	sampling and 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.

See previously submitted Form 19 Document # 400610805 and attached documentation for more information (update 7/25/2022)

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):

See attach Supplemental Form 19 and NOC report

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

See attach Supplemental Form 19 and NOC report

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

See attach Supplemental Form 19 and NOC report

Additional Investigative Actions☐ Additional alternative investigative actions described in attached Site Investigation Plan (summary):**SITE INVESTIGATION REPORT**

SAMPLE SUMMARY

Soil

Number of soil samples collected 25
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 8992

NA / ND

-- Highest concentration of TPH (mg/kg) 360
-- Highest concentration of SAR 9.4
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 7

Groundwater

Number of groundwater samples collected 3
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 7
Number of groundwater monitoring wells installed 2
Number of groundwater samples exceeding 915-1 0

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?

See attach Supplemental Form 19 and NOC report

☐ Were background samples collected as part of this site investigation?

See attach Supplemental Form 19 and NOC report

☐ 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?

See attach Supplemental Form 19 and NOC report

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.

See previously submitted Form 19 Document # 400610805

Update (7/25/2022) - See attach Supplemental Form 19 and NOC report

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.

See attach Supplemental Form 19 and NOC report

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

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.

Four (4) monitoring wells will be installed downgradient and one (1) upgradient of the excavated area. It is anticipated that the total depth of each monitoring well will range between 15-20 feet below ground surface, depending on the water table which, during the excavation activities, has been determined to be approximately seven (7) feet. A map depicting the proposed location of the monitoring wells is included in Attachment A. A groundwater monitoring plan is included as Attachment B.

(update 7/25/2022) - See attach Supplemental Form 19 and NOC report

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.

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

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation?

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.

The excavation will be backfilled after the cliff swallow nesting period is over (anticipate early August). The tanks will then be re-set, and the pad recontoured to it's original grade. As the location is a working well pad, no additional reclamation activities are planned at the current time.

(Update 7/25/2022 - Refer to attached documentation and NOC report for more information)

Is the described reclamation complete? Yes

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? No

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. 05/16/2014

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/19/2014

Proposed site investigation commencement. 05/19/2014

Proposed completion of site investigation. 06/30/2014

REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/16/2014

Proposed date of completion of Remediation. 03/19/2015

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

Please forward onto John Heil

In response to NOAV Doc# 403003375, this Supplemental Form 27 is being submitted to provide closure documentation for the Clough GV 25-57 groundwater site investigation and soil remediation (REM# 8576).

Work conducted throughout 2014 and 2015 is summarized in the attached documents and closure requested through a Noticed of Completion (NOC) report that was submitted on 3/19/2015 via Supplemental Form 19. Below is a list of documents that were submitted to the COGCC in chronological order, which can also be found in the attachment section of this Supplemental Form 27;

- Initial Form 19 – Doc# 400610805 - (5/19/2014)
- Site Investigation & Remediation Plan (Form 27) – Doc# 1733767 – (7/23/2014)
- Sundry Notice (Form 4) – Doc# 400782116 – (1/28/2015)
- Supplemental Form 19 (NOC Closure) – Doc# 400811468 – (3/19/2015)

Note that the water data table and lab reports from the surface and groundwater sampling is available within the NOC report starting on page 292. The surface water data report for the pond sampling has been included to this Supplemental Form 27 as a separate attachment.

It is assumed that the old version of the Form 27 was used as this was during a period where the electronic versions of the Form 27 were being developed and underwent periodic maintenance, giving reason as to why a "Supplemental" Form 27 was not prepared, resulting in closure request being submitted via Supplemental Form 19.

Based on the information above, TEP is requesting closure of REM# 8576.

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

Signed: Kris Rowe

Title: TEP Environmental

Submit Date: 07/26/2022

Email: krowe@terraep.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: John Heil

Date: 12/07/2022

Remediation Project Number: 8576

COA Type

Description

	Based on a 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.
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

403115711	FORM 27-SUPPLEMENTAL-SUBMITTED
403115783	SITE INVESTIGATION REPORT
403115784	SITE INVESTIGATION REPORT
403115785	CORRESPONDENCE
403115787	OTHER
403115839	ANALYTICAL RESULTS
403116342	ANALYTICAL RESULTS

Total Attach: 7 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	NFA was approved by Stan Spencer on 03/19/2015, see Form 19 Supplemental Doc #400811468 for closure request.	12/07/2022

Total: 1 comment(s)