

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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403115338
Receive Date:
07/27/2022

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

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 4918 Initial Form 27 Document #: 2605177

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: ALLEGED SPILL OR RELEASE

SITE INFORMATION

No Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 045-14154	County Name: GARFIELD
Facility Name: PUCKETT WGV 21-23-697	Latitude: 39.512489	Longitude: -108.189658	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 23	Twp: 6S	Range: 97W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

PRATHER SPRING (SEO PERMIT #233234). - See documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	PETROLEUM HYDROCARBONS DETECTED	SAMPLES
Yes	SOILS	NOT YET DETERMINED	FIELD 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.

FOR ADDITIONAL INFORMATION AND A MORE DETAILED DESCRIPTION OF THE FOLLOWING INFORMATION REFER TO THE ATTACHED DOCUMENT IDENTIFIED AS THE "CHRONOLOGY OF INTERIM RESPONSE ACTIVITIES" AND THE ASSOCIATED ADDENDUM.1) WATER SAMPLES WERE COLLECTED (WEEKLY) FROM THE SPRING, CABIN, AND LATER, THE POND;2)A SUPPLY - 20 FIVE-GALLON BOTTLES - OF POTABLE WATER AND FOUR DISPENSERS WERE DELIVERED TO THE PRATHER CABIN TO BE USED FOR DRINKING/COOKING WATER;3)THE STOCK POND, SPRING SOURCE, AND STREAM FROM THE POND TO THE SPRING SOURCE WERE FENCED TO PREVENT AND RESTRICT ACCESS BY LIVESTOCK AND WILDLIFE; 4)PROVIDED BULK POTABLE WATER SUPPLY (3200 GALLON TANK) FOR SHOWERING/TOILETTE USES. THE POTABLE TANK IS PLUMBED INTO THE PRATHER'S SUPPLY DOWNSTREAM OF THEIR ORIGINAL CISTERN. THE ORIGINAL CISTERN HAS BEEN COMPLETELY BY-PASSED AND IS NOT CURRENTLY PART OF THEIR WATER DELIVERY SYSTEM; 5) A GROUND WATER INVESTIGATION AND REMEDIATION PLAN WAS DEVELOPED AND IMPLEMENTED. FIELD INVESTIGATION BEGAN THE WEEK OF JULY7-11, 2008 AND EXTENDED THROUGH UNTIL WINTER CONDITIONS PROHIBITED ACCESS TO THE SAMPLE LOCATIONS; 6)BRADENHEAD TESTS WERE PERFORMED ON THE WELL, IN THE PRESENCE OF THE COGCC - ZERO PRESSURE WAS DETECTED; AND 7)THE ASSOCIATED GATHERING LINE, LOCATED IN THE GENERAL VICINITY OF THE WGV21-23-697 WELL PAD (IE MV 6-14) WAS PRESSURE TESTED AND INVESTIGATED (PHOTOIONIZATION DETECTION AND SOIL BORING/SAMPLING TO BEDROCK FOR HYDROCARBONS) TO ENSURE STRUCTURAL INTEGRITY AND IDENTIFY ANY POTENTIAL FAILURE POINTS.

(Update 7/25/2022 - Refer to REM# 4918 & 4919 for additional documentation and the attached Form 4 for closure approval)

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 documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

Proposed Groundwater Sampling

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

See documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

Proposed Surface Water Sampling

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

See documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

Additional Investigative Actions

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

See documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

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?

Approximate areal extent (square feet) 0

NA / ND

 Highest concentration of TPH (mg/kg)

 Highest concentration of SAR

BTEX > 915-1

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

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?

See documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

Were background samples collected as part of this site investigation?

See documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

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 documentation available under REM# 4918 & 4919 as well as refer to attached closure documentation

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.

NOT YET DETERMINED. THERE HAS BEEN NO KNOWN SPILL OR RELEASE OF CONTAMINANTS FROM THE WGV 21-23-697 WELL PAD THAT WOULD HAVE CONTAMINATED PRATHER SPRING. REVIEW OF DRILLING AND COMPLETION DOCUMENTS REVEALED NO INDICATION OF COMPLICATION DURING OR AFTER COMPLETION OF THOSE ACTIVITIES. A JOINT INVESTIGATION AND SAMPLING DESIGN WAS USED TO VERIFY/CONFIRM THAT THE SOURCE OF CONTAMINATION OF THE PRATHER SPRING IS NOT RELATED TO THE WGV 21-23-697 LOCATION. ALL HAUL TICKETS WILL BE SUBMITTED FOR FLUIDS WHICH HAVE BEEN BROUGHT TO THE SUBJECT LOCATION AND PLACED IN THE ASSOCIATED PRODUCTION PIT FROM OFFSITE. TWO STORAGE TANKS REMAIN AT THE LOCATION, ONE FOR PRODUCED WATER AND THE OTHER FOR CONDENSATE. THE LINED PIT AT THE WGV 21-23-697 LOCATION WAS CONSTRUCTED IN AUGUST 2007 AND HAS NO HISTORY OF RELEASES OR LEAKS. MITIGATION OF IMPACTS, INCLUDING REMOVAL AND DISPOSAL OF E&P WASTES, MAY ONLY BE DETERMINED ONCE THE SITE INVESTIGATION WORK PLAN HAS BEEN IMPLEMENTED, AND THE FINDINGS EVALUATED.

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.

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ 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

- _____ 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.

PLEASE SEE THE ATTACHED PHASE 1 - SITE INVESTIGATION WORKPLAN.

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.

NOT YET DETERMINED.

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). _____

Proposed site investigation commencement. 05/31/2008

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

Please forward onto John Heil

In response to NOAV Doc# 403003375, this Supplemental Form 27 is being submitted to provide closure documentation for the WGV 21-23-597 (Prather Springs Investigation), REM# 4918 & 4919.

COGCC issued closure of this incident on 4/27/2015 via Sundry Notice Form 4 (Doc# 400820252). Attached is a copy of the approved Form 4 closure. Additional documentation can be viewed under REM# 4918.

A duplicate REM# was generated for this site investigation (REM# 4919). TEP is requesting COGCC change the status on REM# 4818 and REM# 4819 to closed as this incident has already been resolved.

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: 07/27/2022

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: 4918

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**

403115338	FORM 27-SUPPLEMENTAL-SUBMITTED
403115342	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)