

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

403186974

Receive Date:

10/05/2022

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>SIMCOE LLC</u>	Operator No: <u>10749</u>	<b>Phone Numbers</b>
Address: <u>1199 MAIN AVE SUITE 101</u>		
City: <u>DURANGO</u> State: <u>CO</u> Zip: <u>81301</u>		
Contact Person: <u>Sabre Beebe</u>	Email: <u>sabre.beebe@ikavenergy.com</u>	
		Phone: <u>(970) 852-5172</u>
		Mobile: <u>(970) 769-9523</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 24472 Initial Form 27 Document #: 403123415

#### 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>325927</u>	API #: _____	County Name: <u>LA PLATA</u>
Facility Name: <u>PICCOLI GAS UNIT A-M34N9W</u>		Latitude: <u>37.169807</u>	Longitude: <u>-107.792396</u>
<u>23SWSE</u>			
** correct Lat/Long if needed: Latitude: <u>37.170074</u>		Longitude: <u>-107.792056</u>	
QtrQtr: <u>SWSE</u>	Sec: <u>23</u>	Twp: <u>34N</u>	Range: <u>9W</u> Meridian: <u>M</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications CL Most Sensitive Adjacent Land Use Agriculture

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

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> E&P Waste       | <input checked="" type="checkbox"/> Other E&P Waste  | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water  | <input type="checkbox"/> Workover Fluids             |  |
| <input type="checkbox"/> Oil             | <input checked="" type="checkbox"/> Tank Bottoms     |  |
| <input 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	SOILS	Unk	Sampling area of buried tank

### INITIAL ACTION SUMMARY

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

Activity is to remove the partially buried pit tank from the NE corner of location as it is not longer needed for operations. Upon removal of the tank samples will be taken from the base and side walls of the area as noted below and depicted in the attached diagram. Upon determination of compliance with table 915.1 on sampling the area will be back filled and left flat until final reclamation. Removal of tank is planned to begin as early as possible following approval of this form 27

### 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 ):

Two samples will be taken. One grab sample from the center base of the area where tank is removed and analyzed for table 915.1 compliance. One 4-PT composite sample taken from the side walls of the area and analyzed for table 915.1 compliance.

#### Proposed Groundwater Sampling

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

#### Proposed Surface Water Sampling

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

### 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 3

Number of soil samples exceeding 915-1 1

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 225

**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

**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.

**NA / ND**

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 7.21

BTEX &gt; 915-1 No

Vertical Extent &gt; 915-1 (in feet) 6

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND Highest concentration of Xylene (µg/l)

ND Highest concentration of Methane (mg/l)

**OTHER INVESTIGATION INFORMATION**☐ Were impacts to adjacent property or offsite impacts identified?☐ Were background samples collected as part of this site investigation?

Background sample collected on 1/24/2022 in response to release. Refer to remediation #24470 for release

☐ 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.

Mechanical excavation

**REMEDIAL ACTION 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.

Any impacts encountered throughout the project will be excavated and taken to approved facility for disposal.

**Soil Remediation Summary**☐ In Situ☐ Ex Situ

Bioremediation ( or enhanced bioremediation )

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards)

\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

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.

## 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? 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? No

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? No

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.

No reclamation will occur in the area of the tank removal as this area is on an active well pad. The excavated area will be backfilled with clean soils and graded flat to match the well pad contour.

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. 08/08/2022

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. 08/09/2022

Proposed completion of site investigation. 08/30/2022

### 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

On 1/11/2022 a release was discovered on subject location on the discharge line on subject pit tank. Spill ID 481402 and remedial project 22776. Through the investigation of the release it was determined that this tank was no longer required for operations and would be removed. Sampling after removal of tank as suspected demonstrated elevated SAR levels in the sidewall soils. The tank area is a part of the insitu remediation project 22776. Therefore, Simcoe is requesting the form 27 work plan 24472 be closed as the remediation of elevated SAR is progressing under project 22776.

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

Signed: Sabre Beebe

Title: Environmental Coordinator

Submit Date: 10/05/2022

Email: sabre.beebe@ikavenergy.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: 12/14/2022

Remediation Project Number: 24472

## COA Type

## Description

	<p>It is stated that "The tank area is a part of the in situ remediation project 22776. Therefore, Simcoe is requesting the form 27 work plan 24472 be closed as the remediation of elevated SAR is progressing under project 22776. "</p> <p>This request is being denied as the tank facility was being closed under Remediation 24472.</p>
	<p>The following exceed Table 915-1 Cleanup Concentrations using the Protection of Groundwater Screening Level Concentrations:</p> <p>Arsenic (Table 915-1 = 0.29 mg/kg) 5.27 mg/kg at 6 feet bgs and 3.07 mg/kg at 3.5 feet bgs.</p> <p>Barium (Table 915-1 = 82 mg/kg) 590 mg/kg at 6 feet bgs and 350 mg/kg at 3.5 feet bgs.</p> <p>Cadmium (Table 915-1 = 0.38 mg/kg) Method Detection Limit 2.54 mg/kg; reported less than 5 mg/kg</p> <p>Chromium VI (Table 915-1 = 0.00067 mg/kg) 0.298 mg/kg at 6 feet bgs and 0.298 mg/kg at 3.5 feet bgs.</p> <p>Lead (Table 915-1 = 14 mg/kg) 13.80 mg/kg at 6 feet bgs and 18.4 mg/kg at 3.5 feet bgs.</p> <p>Selenium (Table 915-1 = 0.26 mg/kg) Method Detection Limit 3.59 mg/kg ; reported less than 20.0 mg/kg</p> <p>Silver (Table 915-1 = 0.8 mg/kg) Reporting Limit 1.00 Method Detection Limit 0.518</p> <p>The following exceed Table 915-1 Cleanup Concentrations Soil Suitability for Reclamation: SAR 7.21 composite sidewall samples at 3.5 feet bgs.</p>
	<p>Closure of the partial buried tank removal is denied. The Initial F27 (Doc #403123415) stated that a four (4) point composite of the sidewall will be collected. The Initial F27 was conditioned with the following COA:</p> <p>Discrete soil samples shall be collected and analyzed for Table 915-1 Cleanup Concentrations using the Protection of Groundwater Screening Level Concentrations.</p> <p>Rule 913.b.(2).C. Composite sample results may be submitted for preliminary analysis and waste profiling. Discrete sample results will be required for confirmation sampling.</p>
3 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.

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
403186974	FORM 27-SUPPLEMENTAL-SUBMITTED
403187383	ANALYTICAL RESULTS
403187384	SOIL SAMPLE LOCATION MAP
403187386	MAP
403187388	ANALYTICAL RESULTS

Total Attach: 5 Files

## **General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Under the REMEDIATION COMPLETION SUMMARY and Is this a Final Closure Request for this Remediation Project? COGCC Staff changed the status from YES to NO.	12/14/2022

Total: 1 comment(s)