

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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403207969  
Receive Date:  
10/28/2022

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) 263-2760 Mobile: (970) 623-4875
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 #: 4135 Initial Form 27 Document #: 1981148

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: WELL	Facility ID: _____	API #: 045-07017	County Name: GARFIELD
Facility Name: CLOUGH RMV 57-20	Latitude: 39.512886	Longitude: -107.918416	
** correct Lat/Long if needed: Latitude: 39.513614		Longitude: -107.919176	
QtrQtr: SWNW	Sec: 20	Twp: 6S	Range: 94W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications OL Most Sensitive Adjacent Land Use RANGELAND  
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No  
Is groundwater less than 20 feet below ground surface? No

**Other Potential Receptors within 1/4 mile**

Ephemeral drainages lie approximately 550 to the east, but does not currently contain any live surface water, nor did it at the time of release or time of sampling.

# 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 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	SOILS	PAD AND PIPELINE RIGHT OF WAY	VISUAL SITE INSPECTION
Yes	VEGETATION	IMPACTED AREAS IN PIPELINE	VISUAL SITE INSPECTION

## 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 FORM 19 AS TO WHAT CAUSED THE SPILL AND ACTIONS TAKEN BY WILLIAMS RESPONSE PERSONEL.

Update 10/25/2022: As outlined within the initial Form 19 and Initial Form 27 submitted in 2007. Human error is the cause for this release. A water truck driver was pulling condensate from one of the temporary tanks on site and left the valve open on the truck. The driver then proceeded to get back into the cab of the truck, unaware of the condensate draining out of the truck valve onto the pad. Production personnel driving by noticed the condensate being released and alerted the driver. The driver quickly turned off the pumps and closed all valves. By that time, condensate had ran across the pad near the location entrance and down the pipeline right of way.

Because of the timeframe of when the release occurred, limited documentation is available due to laboratory and subcontractor spill response company records retention polices.

## 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 ):

Original data reports could not be located due to the record retention policies in place with the laboratory. Because the original data reports could not be obtained, TEP elected to collect two new samples, which would be analyzed for the COGCC Table 915-1 clean-up standards to ensure compliance with current regulations.

### 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 2  
Number of soil samples exceeding 915-1 0  
Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_  
Approximate areal extent (square feet) 6000

**NA / ND**

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

**Groundwater**

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 100  
Number of groundwater monitoring wells installed 0  
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**

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?

Condensate flowed offsite to the south and down a pipeline right of way.

Were background samples collected as part of this site investigation?

Three background samples were collected from nearby undisturbed locations.

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?

NO

**REMEDIAL ACTION PLAN**

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes \_\_\_\_\_

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

IMPACTED SOIL ON THE PAD WILL BE ACCOMPLISHED UTILIZING A TRACKHOE AND A DUMPTRUCK. IMPACTED SOIL IN THE PIPELINE RIGHT OF WAY WILL BBE ACCOMPLISHED UTILIZING A TRACKHOE AND A DUMPTRUCK.

**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.

Because of the timeframe of when the release occurred, limited documentation is available due to laboratory and subcontractor spill response company records retention policies, specific details pertaining to the remediation are limited. Based on photo documentation that was discovered on an old digital camera memory card, the impacted soils on the pad and along the pipeline right of way were excavated using a backhoe/trackhoe and grader. Soils were hauled offsite for subsequent mangement as outlined within the Initial Form 19 and Form 27.

**Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation ) Yes \_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 100



# 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.

AFTER EXCAVATION AND CONFIRMATORY SAMPLING THE IMPACTED AREAS ON THE PAD WILL BE FILLED WITH ROADBASE AND RECOMPACTED.

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? \_\_\_\_\_

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. 10/27/2007

Proposed completion of site investigation. 10/29/2007

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/02/2007

Proposed date of completion of Remediation. 11/09/2007

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

In response to NOAV Doc# 403003375, this Supplemental Form 27 is being submitted to provide closure documentation for the MV 57-20 release that occurred in October 2007 and issued REM# 4135 on the Initial Form 27 (Doc# 1981148). A status update was provided via Supplemental Form 27 (Doc# 403120334) on 7/29/2022, outlining TEP proposed course of actions.

As outlined within the status update Supplemental Form 27 (Doc# 403120334) submitted on 7/29/2022, TEP has completed an evaluation of the incident and the only records that were obtained from subcontractor personnel were photos of the initial release and remediation from an old digital camera memory card. Photos were used to determine the area of impacts and allow TEP personnel to collect new samples from within the area where the release occurred in 2007. It was decided to collect a new sample due the date of the incident extending beyond the laboratory and subcontractor record retention policies, making the original data reports unavailable. Additionally, three background samples have been collected for metal and inorganic comparison. Confirmation sampling analysis consisted of COGCC Table 915-1 constituents to comply with current regulatory requirements.

Samples were collected as shown within the attached sample location map from depths of 0-12" below ground surface. Visual assessment of the area where the release occurred did not indicate any signs of impacts (stressed vegetation, staining, white crusting, hydrocarbon odors, etc.) nor did field screening results suggest a hydrocarbon concentration at or above COGCC thresholds. Results from the confirmation sampling confirmed that soils do not exceed COGCC Table 915-1 thresholds.

Attached are photos from the initial release and remediation that occurred in 2007, as well as photos from the location as of October 2022.

TEP is requesting closure of this project and REM# 4135

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: 10/28/2022

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: 12/20/2022

Remediation Project Number: 4135

### COA Type

### Description

<u>COA Type</u>	<u>Description</u>
0 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

403207969	FORM 27-SUPPLEMENTAL-SUBMITTED
403208021	ANALYTICAL RESULTS
403208023	ANALYTICAL RESULTS
403208024	ANALYTICAL RESULTS
403208026	PHOTO DOCUMENTATION
403208028	SOIL SAMPLE LOCATION MAP
403208040	PHOTO DOCUMENTATION

Total Attach: 7 Files

## General Comments

### User Group

### Comment

### Comment Date

Environmental	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.	12/20/2022
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Total: 1 comment(s)