

# State of Colorado Oil and Gas Conservation Commission

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Report taken by:

Steven Arauza

## 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: CAERUS PICEANCE LLC	Operator No: 10456	<b>Phone Numbers</b> Phone: (970) 285-2925 Mobile: (970) 640-6919
Address: 1001 17TH STREET #1600		
City: DENVER	State: CO Zip: 80202	
Contact Person: Blair Rollins	Email: brollins@caerusoilandgas.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 19022 Initial Form 27 Document #: 402722447

#### 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: Well and flowline abandonment for the Dunn 9-1C

#### SITE INFORMATION

Yes Multiple Facilities

Facility Type: WELL	Facility ID:	API #: 045-13329	County Name: GARFIELD
Facility Name: DUNN 9-1C (B9E)	Latitude: 39.466700	Longitude: -107.668480	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNE	Sec: 9	Twp: 7S	Range: 92W Meridian: 6 Sensitive Area? Yes
Facility Type: FLOWLINE	Facility ID: 334833	API #:	County Name: GARFIELD
Facility Name: DUNN-67S92W 9NWNE	Latitude: 39.466740	Longitude: -107.668780	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNE	Sec: 9	Twp: 7S	Range: 92W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Cropland

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

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

Surface water pond is located adjacent to the well pad.

## **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
UNDETERMINED	SOILS	To be determined	Laboratory analysis

### INITIAL ACTION SUMMARY

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

In July 2021, the DUNN 9-1C well at the Location was plugged and abandoned. Colorado Oil and Gas Conservation Commission (COGCC) Form 27 Document 402722447 was submitted to open Remediation Project Number 19022. Initial site investigation was performed on July 14, 2021. See the attached report of work completed (ROWC) for site investigation details.

### 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 ):

Additional soil samples will be collected in order to delineate pH, arsenic, and SAR exceedances and/or background soil samples will be collected to further characterize native levels of pH, arsenic, and SAR at the Location. Based on recent site investigation results, Caerus requests a reduced analyte list of pH, arsenic, and SAR.

#### Proposed Groundwater Sampling

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

Caerus does not anticipate encountering groundwater associated with the well head and flowline P&A process. If groundwater is encountered, Caerus will notify the COGCC and attempt to collect a representative sample for analysis.

#### 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 20

Number of soil samples exceeding 915-1 20

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

Approximate areal extent (square feet) 1500

### NA / ND

-- Highest concentration of TPH (mg/kg) 256

-- Highest concentration of SAR 9.93

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 17

### 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

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?

Background soil samples have been collected as part of this investigation and are included within the attached ROWC.

☐ 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?

Caerus proposes to complete additional delineation of the impacts associated with this project as outlined in the attached Report of Work Completed.

## 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.

No source of impact has been confirmed to date for the proposed activities. If impacts are identified and confirmed through laboratory analysis, Caerus will provide this information to the COGCC with plans for source removal.

## REMEDATION 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.

On July 14, 2021, initial excavation and sampling activities associated with the wellhead abandonment were performed. During excavation, historical drill cuttings were encountered. Soil samples were collected to characterize the impacted material and were submitted for laboratory analysis. P&A activities were postponed pending laboratory results from the characterization samples. On October 13, 2021, additional samples were collected to delineate pH exceedances observed in the initial characterization samples and to complete P&A sampling activities. Using excavation equipment, five potholes were advanced to depths of 6 to 15 feet below ground surface (bgs). Soil was characterized and field screened from each pothole. Samples were collected from the terminus of each pothole for laboratory analysis. Results indicated compliance with all COGCC Table 915-1 analytical constituents except for arsenic, pH, and sodium adsorption ratio (SAR).

On October 17 and 18, 2022, additional soil samples were collected to delineate SAR and pH exceedances. Using both a hydrovacuum truck and 4-inch solid stem drill rig, three soil borings were advanced to a depth of 17 feet below ground surface (bgs). Samples were collected from 5, 10 to 12, and 15 to 17 feet bgs from each pothole for laboratory analysis. Additionally, background soil samples were collected from comparable, nearby, non-impacted soil to further characterize native soil conditions at the Location. Analytical results for all delineation soil samples are within COGCC Table 915-1 Residential Soil Screening Levels for all constituents except SAR, pH, arsenic, and chromium (VI). Analytical results of background soil samples exceed COGCC Table 915-1 Residential Soil Screening Levels for all constituents except pH, arsenic, and chromium (VI). See the attached ROWC for proposed alternative allowable limits, proposed site investigation activities, and site investigation details.

## **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**

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ Air sparge / Soil vapor extraction

No \_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ 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.

Groundwater is not expected to be encountered at the site. If groundwater is identified, Caerus will attempt to collect a sample for analysis and will provide these results to the COGCC under Supplemental eForm 27.

## 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 Q4 2022 Status Update

### 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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, Caerus has general liability insurance in the amount of \$1M, and Caerus has umbrella insurance, which sits over the general liability insurance in the amount of \$75M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$76M.

Operator anticipates the remaining cost for this project to be: \$ 15000

### 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?

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards?

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.

Caerus plans to return the disturbed area to the active working surface of the well pad for continued operation.

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? 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? Yes

### 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). 07/08/2021

Proposed site investigation commencement. 07/14/2021

Proposed completion of site investigation. 12/01/2023

### 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**

Caerus is requesting to analyze this project under the COGCC Residential Soil Screening Level Concentrations for the B9E P&A Remediation Project based on the following information:

The B9E pad elevation is at 6,120 and the groundwater well located 0.8 miles northeast is at an elevation of 6,090 feet. The static groundwater level within the well is 65 feet below ground surface. Based on the site condition outlined above, Caerus requests to utilize the COGCC Table 915-1 Residential Soil Screening Level Concentrations for the project as there is no reasonable pathway for groundwater at the location of the Remediation Project.

Caerus requests to utilize COGCC Table 915-1 Footnote 1 for an alternative allowable concentration for pH, and Footnote 11 for an alternative allowable concentration for arsenic and chromium (VI).

Based on the information provided in the field investigation and outlined in the attached Report of Work Completed, Caerus requests a reduced analyte suite for the project to include SAR, pH, and arsenic.

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

Signed: Chris McKisson

Title: Managing Partner

Submit Date: 12/12/2022

Email: chris.mckisson@confluence-cc.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: Steven Arauza

Date: 12/29/2022

Remediation Project Number: 19022

**COA Type****Description**

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**

403252186	FORM 27-SUPPLEMENTAL-SUBMITTED
403257806	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

Environmental	Based on information provided for background samples, the Operator's requests to establish alternate allowable concentrations for arsenic and chromium VI under Table 915 -1 Footnote 11 and pH under Footnote 1 are conditionally approved.	12/29/2022
Environmental	Based on the information provided, the Operator's request for a reduced analyte suite of pH, arsenic, and SAR is conditionally approved.	12/29/2022

Total: 2 comment(s)