

State of Colorado
Oil and Gas Conservation Commission

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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
Address: 1058 COUNTY ROAD 215		Phone: (970) 263-2760
City: PARACHUTE State: CO Zip: 81635		Mobile: (970) 623-4875
Contact Person: Michael Gardner	Email: mgardner@terraep.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 19552 Initial Form 27 Document #: 402762248

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

No Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 045-06686	County Name: GARFIELD
Facility Name: HOAGLUND GV 79-35	Latitude: 39.475521	Longitude: -107.960166	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 35	Twp: 6S	Range: 95W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications OL Most Sensitive Adjacent Land Use Grazing
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? No

Other Potential Receptors within 1/4 mile

None

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- X E&P Waste
Other E&P Waste
Non-E&P Waste
Produced Water
Workover Fluids
Oil
Tank Bottoms
Condensate
Pigging Waste
X Drilling Fluids
Rig Wash
Drill Cuttings
Spent Filters
Pit Bottoms
Other (as described by EPA)

DESCRIPTION OF IMPACT

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Row 1: No, SOILS, No known impacts. None anticipated, Routine, planned P&A of single well.

INITIAL ACTION SUMMARY

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

The Hoaglund GV 79-35 well is to be plugged and abandoned per the approved Form 6 (doc #402608187) which is attached to this Form 27.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

X Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

One sample collected from the depth of where the wellhead is cut (~4-feet below ground surface) and analyzed for full COGCC Table 915-1

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

NA / ND

Number of soil samples collected 1

Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 0

Highest concentration of SAR _____

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

BTEX > 915-1 No

Approximate areal extent (square feet) 0

Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) 100

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed 0

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 0

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?

Were background samples collected as part of this site investigation?

Three (3) 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?

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.

The Hoaglund GV 79-35 will be plugged and abandoned per the approved Form 6 (doc # 402608187) which is attached to this Form 27.

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.

This request is for the routine plugging and abandonment of a single well at the GV 79-35 well pad (COGCC Location ID 334762). There are no known or anticipated impacts from contaminated materials related to the plugging and abandonment of this well. Any contaminated soils encountered during these routine P&A activities will be immediately assessed for compliance with COGCC 915-1 cleanup standards and cleaned-up accordingly.

Update 1/3/2023: No impacted material was encountered during the P&A activities. All soils evaluated field screened below Table 915-1 and confirmation analysis indicates soils do not exceed COGCC thresholds.

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

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.

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? No _____

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.

There are other active wells at this location, and final site reclamation activities for the well pad are not planned until such a time as all wells are plugged and abandoned at some point in the future. Site reclamation dates below are only approximate and will be updated at a later date.

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. 08/01/2041

Proposed date of completion of Reclamation. 12/31/2041

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. 06/01/2021

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/09/2021

Proposed site investigation commencement. 11/09/2022

Proposed completion of site investigation. 12/02/2022

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

This Supplemental Form 27 is being submitted to provide documentation pertaining to the GV 79-35 plugging and abandonment (P&A) of well API# 05-045-06686.

Soils around the wellhead were excavated to expose an area approximately 5'x5' wide and 4-feet in depth, where P&A operations were conducted. During the excavation, soils were evaluated visually and olfactory by field personnel. During sampling, samples were collected in 1-foot increments and field screened using a PID unit. Evaluation of the soils did not indicate any hydrocarbon concentrations exceeding COGCC Table 915-1 standards were observed. A single soil sample was collected at ~4-feet bgs, adjacent to the cut section of the wellhead occurred. For further details, refer to the attached field form for additional information, as well as the Form 6 and Form 42 available on the COGCC database associated with API# 05-045-06686.

Confirmation soil results indicated the soils do not exceed COGCC Table 915-1 thresholds and no remediation was necessary. Refer to the attached raw data reports and data tracker for confirmation results.

Upon successful P&A operations, the area was backfilled and compacted.

TEP is requesting closure of the REM# 19552 as no impacts were discovered requiring remediation.

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: 01/03/2023

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: 01/17/2023

Remediation Project Number: 19552

COA Type

Description

COA Type	Description
1 COA	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.

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

Att Doc Num	Name
403278230	FORM 27-SUPPLEMENTAL-SUBMITTED
403278338	PHOTO DOCUMENTATION
403278339	ANALYTICAL RESULTS
403278340	SOIL SAMPLE LOCATION MAP
403278341	ANALYTICAL RESULTS
403278342	ANALYTICAL RESULTS
403278424	OTHER

Total Attach: 7 Files

General Comments

User Group

Comment

Comment Date

User Group	Comment	Comment Date
Environmental	Operator states "Confirmation soil results indicated the soils do not exceed COGCC Table 915-1 thresholds and no remediation was necessary." Soil sample analytical results report a pH value of 8.47 for the Wellhead sample which is greater than the Table 915-1 value of 8.3. However, the Wellhead pH value is similar to background concentrations and therefore COGCC approves the request for closure.	01/17/2023

Environmental	Operator states "Confirmation soil results indicated the soils do not exceed COGCC Table 915-1 thresholds and no remediation was necessary.". Soil sample analytical results report a Arsenic value of 5.1 for the Wellhead sample which is greater than the Table 915-1 value of 0.68 mg/kg. However, the Wellhead Arsenic value is similar to background concentrations and therefore COGCC approves the request for closure.	01/17/2023
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Total: 2 comment(s)