

State of Colorado Oil and Gas Conservation Commission

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



Document Number:

403287791

Receive Date:

01/12/2023

Report taken by:

Jason Kosola

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> | Phone Numbers |
| Address: <u>1199 MAIN AVE SUITE 101</u> | | Phone: <u>(970) 852-5172</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> | Mobile: <u>(970) 769-9523</u> |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 26791 Initial Form 27 Document #: 403266213

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: Reduction in constituent suite to SAR, EC and PH as TPH was ND on 12/5/2022 sample results

SITE INFORMATION

No Multiple Facilities

| | | | |
|--|----------------------------|----------------------------|-------------------------------|
| Facility Type: <u>PIT</u> | Facility ID: <u>115494</u> | API #: <u></u> | County Name: <u>LA PLATA</u> |
| Facility Name: <u>EARL REA GU 1</u> | | Latitude: <u>37.150385</u> | Longitude: <u>-107.737305</u> |
| ** correct Lat/Long if needed: Latitude: <u></u> | | Longitude: <u></u> | |
| QtrQtr: <u>SWNE</u> | Sec: <u>32</u> | Twp: <u>34N</u> | Range: <u>8W</u> |
| Meridian: <u>M</u> | | Sensitive Area? <u>Yes</u> | |

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Agricultural

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

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 |
|-----------|----------------|------------------|--|
| Yes | SOILS | TBD | By excavation and/or pothole delineation |

INITIAL ACTION SUMMARY

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

Upon discovery the release was stopped. The tank was drained via water truck and standing fluids recovered via hydrovac. Volume of recovered fluids not determined as they were recovered in same truck with tank contents.

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):

Previous sampling marked on attached map. Delineation sampling will be conducted each foot on the south side of the compressor and on the west side of the tank from 1 foot to 4 foot in depth and/or bedrock. Excavation will continue as determined by field screen to the north. With potential delineation sampling on the north side in 1 foot increments from 1 foot to 4 foot in depth and/or bedrock.

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):

Additional excavation will begin on 1/12/2023. Based on results from 12/5//2023 sampling event additional excavation is required and/or delineation on all sides except the East sidewall which has returned below the threshold. No additional excavation or sampling will be performed on the east wall. All samples performed on 12/5/2023 have returned non-detect for TPH and Simcoe is requesting that all future sampling be analyzed for the remaining constituent of concern which is SAR, EC and pH. Additional sampling is anticipated to be performed beginning as early as 1/12/2023.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 9
Number of soil samples exceeding 915-1 4
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 1400

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
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 8
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?

4 back ground samples taken previously with 3 additional background samples planned.

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 600 Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Based on sampling on 12/5/23 additional investigation will begin on 1/12/2023 to attempt delineation of the North, South and West sides of the release. The East side wall samples on 12/5/2023 are below the threshold for constituent of concern.

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.

Excavation with trucking to proper disposal facility

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.

Expand previous excavation to the north where not prohibited by equipment safety concerns. Delineation via excavation to the west and the south to delineate those areas.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 1000

_____ 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.

Review of Simcoe, LLC financial assurance bonds indicates that the bond is adequate for the remediation completion of this project. The cost of the remaining work is anticipated to be less than 50% of the bond.

Operator anticipates the remaining cost for this project to be: \$ 11500

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.

Reclamation will not be performed as impacts are to an active well pad. Excavation will be backfilled and compacted for continued operation of the active well pad.

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. 09/12/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/05/2022

Proposed site investigation commencement. 12/05/2022

Proposed completion of site investigation. 03/01/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/05/2023

Proposed date of completion of Remediation. 03/01/2023

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

Simcoe is requesting expedited processing of request to reduce sampling constituents to SAR, EC and pH as TPH returned ND on 12/5/2022 analytics. Next sampling anticipated to be performed on 1/12/2023 should excavation and pothole activities progress as anticipated.

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: 01/12/2023

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: Jason Kosola

Date: 01/19/2023

Remediation Project Number: 26791

COA Type**Description**

| | |
|-------|---|
| | COGCC approves reduced analyte request. |
| 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**

| | |
|-----------|--------------------------------|
| 403287791 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403287812 | MAP |
| 403287829 | ANALYTICAL RESULTS |
| 403287832 | ANALYTICAL RESULTS |

Total Attach: 4 Files

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

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)