

# State of Colorado Oil and Gas Conservation Commission

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Document Number:

403295887

Receive Date:

03/02/2023

Report taken by:

KRIS NEIDEL

## Site Investigation and Remediation Workplan (Initial 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: POC-I LLC	Operator No: 10386	<b>Phone Numbers</b>
Address: P.O. BOX 51208		Phone: (307) 745-6468
City: CASPER	State: WY Zip: 82605	Mobile: ( )
Contact Person: Becky Podio	Email: rpodio@gmail.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 28246 Initial Form 27 Document #: 403295887

#### 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: SPILL OR RELEASE	Facility ID: 482343	API #: _____	County Name: MOFFAT
Facility Name: Ilse Dome Discharge Point	Latitude: 40.307715	Longitude: -107.689715	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

  

Facility Type: SPILL OR RELEASE	Facility ID: 483727	API #: _____	County Name: MOFFAT
Facility Name: Ilse Dome Discharge	Latitude: 40.307715	Longitude: -107.689715	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

## **SITE CONDITIONS**

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Rangeland,  
Surface Water

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

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

The site sits within 1/4 mile of the following the Colorado Parks and Wildlife High Priority Habitat.  
Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area, Elk Winter Concentration Area, Elk Severe Winter Range, Elk Migration Corridor,  
Aquatic Cutthroat Trout designated Crucial Habitat, Greater Sage Grouse General Habitat Management Area, Columbian Sharp-tailed Grouse Winter Range,  
Columbian Sharp-tailed Grouse Production Area, Greater Sage Grouse Priority Habitat Management Area, and Aquatic Native Species Conservation Waters

# 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	Visual inspection and laboratory analysis
Yes	SURFACE WATER	To be determined	Visual inspection and laboratory analysis
UNDETERMINED	VEGETATION	To be determined	Visual 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.

Oil was initially discharged from the discharge outfall of the pit (Facility ID 116589). Booms were placed and areas with a sheen were recovered with a vacuum truck. Representatives of POC have walked the spill pathway to identify areas of impact. No impacted vegetation was observed. Samples of the fluids at the outfall will be collected for the Constituents of Concern (COCs) for CPDS Permit No. CO0000051 and Table 915-1 plus Mercury. Any constituents detected will be sampled in the surface water and stream bank soils. Impacted soils and water will be remediated to below appropriate standards.

On January 19, 2023, representatives of POC walked the Seeping Spring Gulch and identified sixteen (16) initial points of impact along the gulch. A topographic map and a figure depicting the areas of impact are attached.

## 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 ):

16 Grab soil samples will be collected and analyzed for Table 915-1 plus Mercury. In the event that additional impacted areas are encountered, confirmation samples will be collected in those areas. Proposed sample locations in the areas of impact are presented as Figure 2.

### Proposed Groundwater Sampling

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

Ongoing groundwater monitoring at the location is to be completed under Remediation Project #8398

### Proposed Surface Water Sampling

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

Surface water samples will be collected at the outfall and downstream every 500 feet until past the identified areas of impact (see figure 2). The samples will be analyzed for CPDS Permit No. CO0000051 COCs and Table 915-1 Organic and Inorganic Groundwater Parameters.

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

### NA / ND

Highest concentration of TPH (mg/kg)           
Highest concentration of SAR           
BTEX > 915-1           
Vertical Extent > 915-1 (in feet)         

### 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  
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?

16 areas of impact were identified downstream of the outfall (Figure 2)

☐ Were background samples collected as part of this site investigation?

☐ 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

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Based on the visual assessment conducted on January 19, 2023, Quandary Consultants (Quandary) identified sixteen (16) initial points of impact along the gulch. The drainage inspection points are presented in Figure 2. Areas of soil, water, vegetation, or algal mats impact along the Seeping Spring Gulch will be remediated via hand or mechanical removal depending on weather and proximity to the lease road. E&P Waste will be removed and/or excavated and taken to Elk Springs Brine Disposal in Elk Springs, CO, Twin Enviro Services in Milner, CO, or Greenleaf Environmental Services in De Beque, CO.

### 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.

Areas of impact will be remediated via hand or mechanical removal depending on weather and proximity to the lease road. After removal, confirmation soil samples will be collected and analyzed at an accredited laboratory for Table 915-1 constituents of concern plus Mercury. Weather permitting, remediation would begin in March 2023.

### Soil Remediation Summary

☐ In Situ

☒ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

Yes \_\_\_\_\_ Excavate and offsite disposal  
\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 1000  
\_\_\_\_\_ 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 Soil and Surface Water Results

### 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.

POC has sufficient insurance and bonding to fully address the anticipated costs of Remediation, including the remaining estimated costs for this project. The cost for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. POC makes no representation or guarantees as to the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: \$ 40000

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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:

# 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.

The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules with an approved Colorado Parks and Wildlife seed mix after completion of remediation.

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. 06/28/2022

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/28/2022

Proposed site investigation commencement. 03/31/2023

Proposed completion of site investigation. 07/28/2023

## REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/31/2023

Proposed date of completion of Remediation. 07/24/2023

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**

Please route to Alex Fisher and Kris Neidel.

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

Signed: Becky Podio

Title: Petroleum Engineer

Submit Date: 03/02/2023

Email: rpodio@gmail.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: KRIS NEIDEL

Date: 03/20/2023

Remediation Project Number: 28246

**COA Type****Description**

	If groundwater is encountered during pit decommissioning activities, samples will be collected as soon as practical. Groundwater samples will be submitted to an accredited laboratory for analysis of benzene, Toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB, using standard methods appropriate for detecting the target analytes in COGCC Table 915-1. Groundwater shall also be sampled and analyzed for In-organics.
	On a Supplemental F27 prior to the 7/28/23 start date, operator shall provide a description in how they propose to address the liners in the three (3) and final disposition of the liners.
	Operator should provide notice to Environmental staff, Kris Neidel (kris.neidel@state.co.us) or 970-846-5097 72hrs prior to mobilization at beginning of all sampling events or Field work on this project.
	Activity described here shall fully delineate both the lateral and vertical extent of the discharge point and stream channel for all contaminants in Table 915-1 with the addition of Mercury.
	All soil sampling shall be for the complete Table 915-1 Contaminants of Concern plus mercury.
5 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.

**Att Doc Num****Name**

403295887	FORM 27-INITIAL-SUBMITTED
403334832	MAP

Total Attach: 2 Files

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

Environmental	Under the "Project, Purpose, & Site Information" tab, Spill Id 483727 was administratively added by COGCC as this spill ID had the identical lat/long as spill id 482343. Both spills will be closed as part of this Form 27.	03/20/2023
Environmental	Groundwater samples should be collected as a part of this investigation. Samples should be adequate to determine if groundwater has been impacted in the area of the discharge.	03/17/2023
Environmental	It is stated. "Ongoing groundwater monitoring at the location is to be completed under Remediation Project #8398". For reporting purposes the projects will be divided by area. Three projects, three separate areas. Each area will delineate both soil and groundwater.	03/17/2023

Total: 3 comment(s)