

State of Colorado Oil and Gas Conservation Commission

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Document Number:

403347901

Receive Date:

03/22/2023

Report taken by:

Steven Arauza

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: <u>GRAND RIVER GATHERING LLC</u>	Operator No: <u>10403</u>	Phone Numbers
Address: <u>910 LOUISIANA ST STE 4200</u>		Phone: <u>(832) 6086137</u>
City: <u>HOUSTON</u>	State: <u>TX</u>	Zip: <u>77002</u>
Contact Person: <u>Sherri Gregg</u>	Email: <u>sherri.gregg@summitmidstream.com</u>	Mobile: <u>(713) 2923472</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 29054 Initial Form 27 Document #: 403347901

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: <u>SPILL OR RELEASE</u>	Facility ID: <u>483540</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>GR11 - PI20 Pad Sales Line</u>		Latitude: <u>39.421240</u>	Longitude: <u>-108.013090</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESE</u>	Sec: <u>20</u>	Twp: <u>7S</u>	Range: <u>95W</u>
Meridian: <u>6</u>		Sensitive Area? <input type="checkbox"/> No	

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Non-crop land

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

Unnamed ephemeral drainages are 215 ft southwest and 715 ft northeast of the Site. The closest well with a static water level is Permit number 119549. This well is 3380' northwest of the Site and has a static water level of 85'. Residential soil screening levels should be used at this Site.

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	44'L X 31'W X 20'D	Visual, Field Screening, Excavation

INITIAL ACTION SUMMARY

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

From the initial and supplemental Form 19s:

Gas release discovered at PI20 Well Pad on Sales Line about 20 ft north of launcher. Release location is between launcher and meter. The release appears to be within a 1x2 ft area. The estimated release volume is based on initial observation and will be updated as more information becomes available. The release was stopped immediately after discovery and line has been Locked Out and Tagged Out.

The extent of the impacted soil area is still being determined at this time. Excavation is still underway as weather has delayed full delineation of the site. Final impact extent will be updated as information is available. After preliminary excavation, the leak appears to be from a 3/8" hole at the 5 o'clock position on the 8" line. Contractors are on site with equipment digging up the line between the meter and the launcher as weather permits.

Site was excavated and sampled on January 9th 2023 and was cleaned and resampled on January 25th 2023. Please see attached Table, Figure, and Analytical Data.

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):

See Additional Investigative Actions.

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):

Summit intends to submit a 915b reclamation plan for the remainder of the exceedances at this Site with the next Form 27 update. If the 915b is not approved, Summit will conduct additional background soil sampling to better understand the natural concentrations of inorganics in the soil at this site.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 8
Number of soil samples exceeding 915-1 8
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1360

NA / ND

-- Highest concentration of TPH (mg/kg) 5.56
-- Highest concentration of SAR 7.25
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 20

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?

One background sample was collected during Site excavation. Please see attached analytical data for details.

☐ 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?

See Additional Investigative Actions

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Site was excavated and sampled in January 2023.

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.

Summit intends to submit a 915b reclamation plan for the remainder of the exceedances at this Site with the next Form 27 update. If the 915b is not approved, Summit will conduct additional background soil sampling to better understand the natural concentrations of inorganics in the soil at this site.

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

_____ 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.

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:

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.

Summit intends to submit a 915b reclamation plan for the remainder of the exceedances at this Site with the next Form 27 update. If the 915b is not approved, Summit will conduct additional background soil sampling to better understand the natural concentrations of inorganics in the soil and produced water at this site.

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. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/09/2023

Proposed site investigation commencement. _____

Proposed completion of site investigation. 09/01/2023

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

This spill was excavated and sampled in January 2023. Results from the soil sampling event indicate exceedances in SAR, Arsenic, and pH when compared to COGCC Residential Soil Screening Levels (RSSLS). Produced water was sampled and analyzed for Arsenic and pH from the nearby PI20 pad. The produced water sample indicates that the Arsenic and pH exceedances were likely naturally occurring. Please see the attached Operator Knowledge statement and soil analytical results for additional details.

Entrada recommends that Summit file an initial Form 27 Remediation Workplan with the COGCC. Once the Form 27 is approved, a request for closure should be filed for the initial spill/release report Form 19 (Document #403271212). Any future work will proceed under the Form 27.

Summit intends to submit a 915b reclamation plan for the remaining inorganic exceedances at this Site with the next Form 27 update. If the 915b is not approved, Summit will conduct additional background soil sampling to better understand the natural concentrations of inorganics in the soil at this site.

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

Signed: Sherri Gregg

Title: Env Compliance Specialist

Submit Date: 03/22/2023

Email: sherri.gregg@summitmidstream.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: 04/25/2023

Remediation Project Number: 29054

COA Type**Description**

	Submit Supplemental eForm 19 to request closure of Spill/Release ID #483540. Supplemental report shall comply with outstanding COAs, indicate that work is proceeding under an approved eForm 27 and shall reference the Remediation Project number assigned upon approval of this report.
	Operator shall collect soil samples from areas most likely to be impacted and shall collect an appropriate number of representative soil samples to delineate the horizontal and vertical extents of contamination, per Rule 915.e.(2).B.
	Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater.
3 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**

403347901	FORM 27-INITIAL-SUBMITTED
403348599	ANALYTICAL RESULTS
403348601	MAP
403348602	OTHER
403348604	ANALYTICAL RESULTS
403348605	ANALYTICAL RESULTS

Total Attach: 6 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>Approval of this Initial Form 27 does not constitute approval of the Operator's intended Rule 915.b request. As indicated under Operator Comment, "Summit intends to submit a 915b reclamation plan for the remaining inorganic exceedances at this Site with the next Form 27 update. If the 915b is not approved, Summit will conduct additional background soil sampling to better understand the natural concentrations of inorganics in the soil at this site."</p> <p>Note that additional soil sampling for delineation of horizontal and vertical extents of SAR exceedances may be required.</p>	04/25/2023

Total: 1 comment(s)