

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:
403257855
Receive Date:
03/08/2023

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: <u>VISION ENERGY LLC</u>	Operator No: <u>10770</u>	Phone Numbers Phone: <u>(970) 5634000</u> Mobile: <u>()</u>
Address: <u>P O BOX 370</u>		
City: <u>IGNACIO</u>	State: <u>CO</u>	Zip: <u>81137</u>
Contact Person: <u>Trish Harrison</u>	Email: <u>trishharrison@eis-llc.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25518 Initial Form 27 Document #: 403159423

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: <u>PIT</u>	Facility ID: <u>117210</u>	API #: _____	County Name: <u>MESA</u>
Facility Name: <u>FEDERAL 15-1</u>	Latitude: <u>39.245598</u>	Longitude: <u>-108.698882</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>15</u>	Twp: <u>2N</u>	Range: <u>2W</u> Meridian: <u>U</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>077-08030</u>	County Name: <u>MESA</u>
Facility Name: <u>FEDERAL 15-1</u>	Latitude: <u>39.245497</u>	Longitude: <u>-108.697616</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>15</u>	Twp: <u>2N</u>	Range: <u>2W</u> Meridian: <u>U</u> Sensitive Area? <u>No</u>

Facility Type: LOCATION Facility ID: 312383 API #: County Name: MESA
Facility Name: FEDERAL-U2N2W 15SWNW Latitude: 39.245588 Longitude: -108.697732
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: SWNW Sec: 15 Twp: 2N Range: 2W Meridian: U Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Farmland
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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|---|
| <input type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input checked="" type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | Production Equipment _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	TBD	Soil Sample

INITIAL ACTION SUMMARY

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

N/A

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):

Soil grab - 8 samples - Wellhead, Separator, Meter Run, Tank, Pit (2), beginning and end of flowline

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

Number of soil samples collected 10

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 0

NA / ND

Highest concentration of TPH (mg/kg) _____

Highest concentration of SAR _____

BTEX > 915-1 No

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) _____ Highest concentration of Ethylbenzene (µg/l) _____
 Number of groundwater monitoring wells installed _____ Highest concentration of Xylene (µg/l) _____
 Number of groundwater samples exceeding 915-1 _____ 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?
 Three samples were collected from nearby undisturbed areas at a depth of 6" bgs, and analyzed for arsenic, Cr(VI), EC, pH, SAR

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? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

request to be treated in situ

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.

Soil will be treated at the location with exceedances as indicated in the soil sample data below (SAR & EC) with lime.

Soil Remediation Summary

In Situ **Ex Situ**

<u>_____</u> Bioremediation (or enhanced bioremediation)	<u>_____</u> Excavate and offsite disposal
<u>Yes</u> <u>_____</u> Chemical oxidation	<u>_____</u> If Yes: Estimated Volume (Cubic Yards) _____
<u>_____</u> Air sparge / Soil vapor extraction	<u>_____</u> Name of Licensed Disposal Facility or COGCC Facility ID # _____
<u>_____</u> Natural Attenuation	<u>_____</u> Excavate and onsite remediation
<u>_____</u> Other _____	<u>_____</u> Land Treatment
	<u>_____</u> Bioremediation (or enhanced bioremediation)
	<u>_____</u> Chemical oxidation

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: _____

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.

Site to be recontoured and seeded as per BLM approved reclamation plan

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? No

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). 09/30/2022

Proposed site investigation commencement. 09/30/2022

Proposed completion of site investigation. 10/31/2022

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

Please forward onto Steven Arauza
This Supplemental Form 27 is being submitted to provide documentation for the Lipan Wash 14-1 site (previously operated under Maralex Resources).

As outlined within the Initial Form 27, samples were collected from locations where the equipment that was once placed based on historical aerial imagery. Results indicated a negative hydrocarbon concentration in all areas sample.

Confirmation samples were collected from the surface (0-6") and submitted to the lab for COGCC Table 915-1.

Background samples indicated are all within a 2 mile radius and similar soil composition.

Remediation will be done on soils exceeding in SAR and EC around the wellhead. Vertical and horizontal delineation will be done to determine extent of contamination.

Application of Table 915-1 footnote 1 is requested for the soil sample exceedances where exceedances are below background sample values.

Application of Table 915-1 footnote 11 is requested for the soil sample exceedances for arsenic above the background sample levels.

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

Signed: Trish Harrison

Title: Permitting Specialist

Submit Date: 03/08/2023

Email: trishharrison@eis-llc.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: 04/27/2023

Remediation Project Number: 25518

COA Type

Description

	<p>Additional soil sampling is required to delineate the horizontal and vertical extents of arsenic, EC, pH, and SAR exceedances at the wellhead. Arsenic remains a contaminant of concern at the majority of the soil sampling locations.</p> <p>Operator will delineate the extent of Table 915-1 exceedances and remove or remediate impacted materials per Rule 913.b.(2) and Rule 913.b.(5).A.</p>
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

403257855	FORM 27-SUPPLEMENTAL-SUBMITTED
403257877	ANALYTICAL RESULTS
403257878	ANALYTICAL RESULTS
403268631	ANALYTICAL RESULTS
403268637	SOIL SAMPLE LOCATION MAP
403268645	MAP
403341219	REMEDIAL ACTION PLAN

Total Attach: 7 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>COGCC does not concur with Operator's assessment that background soil samples collected within a 2-mile radius are representative of site-specific conditions. Per Table 915-1 Footnote 1, site-specific background concentrations in native soils will be taken into consideration.</p> <p>Site-specific background concentrations for the Federal/Lipan 15-1 Pad (doc #403268631) demonstrate Table 915-1 exceedances for arsenic (5.32-6.29 mg/kg) only. Background levels for EC, SAR, and pH for the site-specific background samples are compliant with Table 915-1.</p> <p>Comparison of analytical results for site investigation soil samples with *site-specific* background conditions indicates that Table 915-1 exceedances remain for arsenic, EC, pH, and SAR at the wellhead and arsenic at all soil sampling locations.</p> <p>See COAs above.</p>	04/27/2023

Total: 1 comment(s)