

State of Colorado Oil and Gas Conservation Commission

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Receive Date:

05/11/2023

Report taken by:

KRIS NEIDEL

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>GULFPORT ENERGY CORPORATION</u> | Operator No: <u>10339</u> | Phone Numbers Phone: <u>(405) 252-4637</u> Mobile: <u>(405) 252-4637</u> |
| Address: <u>713 MARKET DRIVE</u> | | |
| City: <u>OKLAHOMA CITY</u> | State: <u>OK</u> Zip: <u>73114</u> | |
| Contact Person: <u>Jace Marshall</u> | Email: <u>jmarshall@gulfportenergy.com</u> | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25558 Initial Form 27 Document #: 403199346

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: Flare Pit

SITE INFORMATION

No Multiple Facilities

| | | | |
|---|----------------------------|--|---|
| Facility Type: <u>PIT</u> | Facility ID: <u>481584</u> | API #: _____ | County Name: <u>MOFFAT</u> |
| Facility Name: <u>Ridgeview 32-16-1 Flare Pit</u> | | Latitude: <u>40.475666</u> | Longitude: <u>-107.610544</u> |
| | | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____ |
| QtrQtr: <u>NESW</u> | Sec: <u>16</u> | Twp: <u>6n</u> | Range: <u>91w</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Unused agriculture land and wildlife along with livestock.

Is surface water within 1/4 mile?

Is domestic water well within 1/4 mile? Yes _____ Yes _____

Is groundwater less than 20 feet below ground surface? No _____

Other Potential Receptors within 1/4 mile

Water well permit number 33422-F is located approximately 1800-ft west to the southwest from the wellhead. An irrigation canal/stream is located approximately 750-west of the wellhead. Johnson Gulch (Freshwater Emergent Wetland) is an ephemeral stream area that flows into the Yampa River approximately 1040-ft east and 840-ft north of the wellhead.

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 | Excavation, field-screening, drilling |

INITIAL ACTION SUMMARY

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

Impacts will be assessed per rules 911

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):

Yes, based upon discovery of impacted soil. Soil samples will be collected from the bottom hole and sidewalls (cardinal directions) from the flare pit. All samples will be analyzed for the complete list of contaminants of concern as outlined in COGCC Table 915-1. At least one background sample will be collected from an adjacent, upgradient or cross-gradient, unaffected area. The background sample will be analyzed for EC, SAR, pH, boron, metals, and chloride.

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 12
Number of soil samples exceeding 915-1 12
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 1220

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

NA Highest concentration of TPH (mg/kg)
-- Highest concentration of SAR 11
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 14
NA Highest concentration of Benzene (µg/l)
NA Highest concentration of Toluene (µg/l)
NA Highest concentration of Ethylbenzene (µg/l)
NA Highest concentration of Xylene (µg/l)
NA 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?

A background sample was collected northwest of the pad location in undisturbed soil. The sample was analyzed for EC, SAR, pH, Boron, and Metals.

☐ 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.

Impacted soils from the source area were removed, to the extent allowable with standard excavation equipment as bedrock was encountered at 14-17 feet below ground surface thereby limiting removed of impacts. Further remediation was requested by the COGCC. The location will be re-excavated, and the sandstone bedrock will be mechanically removed.

REMEDICATION 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.

The attachment narrative report summarizes all investigation and remediation activities to date. Further excavation is required, and remediation activities will be summarized in a Form 27 Supplemental report. TPH impacts were observed in the excavation bottom, on top of a sandstone layer at approximately 14 bgs at the pit bottom and also on the east sidewall. The pit will be re-excavated to encompass the former flare pit area and observed residual impacts. Impacted soil is not anticipated from surface down to the sandstone layer as indicated by the previous delineation/remediation and borehole investigation. However, excavated materials will be screened with olfactory and visual observations, probing using an electrical conductivity (EC) meter, and Photoionization Detector (PID). If contaminated soils are observed during excavation (down to the sandstone layer) impacted materials will be segregated from fill materials, and the extent of contamination will be delineation and impacts will be removed. When the sandstone layer is reached and when the size of excavation will allow equipment access to the sandstone layer, residual impacts will be removed with a jackhammer. The extent of the impacted area will be further screened/delineated using an electrical conductivity (EC) soil probe and photoionization detector (PID). Soil samples will be collected as needed to characterize and/or demonstrate confirmation of impacts or absence thereof. All confirmation soil samples will be analyzed for all COGCC Table 915-1 parameters to determine regulatory compliance. At least 1 background sample will also be collected in the adjacent undisturbed landscape to the approximate soil depth as site samples.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Yes Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 90

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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

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.

Gulfport Energy has a general liability insurance coverage of \$2-million.

Operator anticipates the remaining cost for this project to be: \$ 100000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards 262

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Moffat County Landfill

Volume of E&P Waste (liquid) in barrels 0

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? No

Does the previous reply indicate consideration of background concentrations?

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.

Reclamation plan will be developed and submitted upon approval.

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. 08/05/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/05/2021

Proposed site investigation commencement. 04/27/2022

Proposed completion of site investigation. 06/30/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/27/2022

Proposed date of completion of Remediation. 06/30/2023

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:

Closure request was denied and this Form 27 was pushed back to draft.

OPERATOR COMMENT

Due to the absence of groundwater during investigation and remediation activities, Gulfport requests to use Residential Soil Screening Levels (RSSL) for site evaluation. Gulfport will further excavate the former flare pit location and remove residual impacts.

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

Signed: Joel Mason

Title: Agent

Submit Date: 05/11/2023

Email: joel.mason@absarokasolutions.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: 05/16/2023

Remediation Project Number: 25558

COA Type**Description**

| | |
|--|---|
| | It is understood that delineation is by excavation. The operator should assure that the vertical delineation is considered complete when soil (including sandstone bottom) is shown to be compliant with Table 915-1. |
| | It is stated that the investigative derived waste (IDW) was, "Soil cuttings generated from drilling operations were thin spread on-site." Management of IDW shall comply with Rule 913.b.(3). |
| | Reseeding with species consistent with the adjacent plant community is encouraged. The Operator will use a seed mixture requested by the surface owner. In the absence of an agreement between the operator and the affected surface owner as to what seed mix should be used, the operator shall consult with a representative of the local soil conservation district to determine the proper seed mix to use in revegetating the disturbed area. A Bureau of Land Management approved seed mix specific to the ecological site would also be acceptable. |
| | Final Reclamation shall comply with the COGCC 1000 Series Rules. Consult COGCC Reclamation Specialist regarding interim and/or final reclamation. |
| | Final report should clarify the discrepancy in sampled/excavation depth of 14 and 18 feet. |

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**

| | |
|-----------|--------------------------------|
| 403265460 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403271157 | SITE MAP |
| 403271158 | OTHER |
| 403271159 | LOGS |
| 403271160 | ANALYTICAL RESULTS |
| 403271161 | ANALYTICAL RESULTS |
| 403271162 | DISPOSAL MANIFESTS |
| 403271982 | REMEDIATION PROGRESS REPORT |

Total Attach: 8 Files

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|-------------------|---|---------------------|
| Environmental | Notice for start of work was given for 5/23/23. | 05/16/2023 |
| Environmental | <p>It is stated, "Lithology in all boring locations consisted of a top layer of colluvial sands with some gravels which graded down to finer silty material from the ground surface to approximately 8-10 feet BGS. From 8-17 feet BGS there was more coarse-grained sand, gravels, and cobbles. Cascade was unable to drill past 14ft at most location due to large cobbles and/or bedrock layer encountered."</p> <p>The consultant should have either stepped out from the refusal location and/or secured a rig that was capable of obtaining samples to the depth(s) of impact. (ie. 18' bgs).</p> | 03/06/2023 |
| Environmental | COGCC received notice the morning of sampling on 11/15/22. | 01/03/2023 |
| Environmental | refusal at 14 feet is listed on the drilling logs as cobbles or sandstone. May investigation should clarify the terminus geology. | 01/03/2023 |

Total: 4 comment(s)