

# State of Colorado Oil and Gas Conservation Commission

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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: CAERUS PICEANCE LLC	Operator No: 10456	<b>Phone Numbers</b> Phone: (970) 778-2314 Mobile: (970) 778-2314
Address: 1001 17TH STREET #1600		
City: DENVER	State: CO Zip: 80202	
Contact Person: Jake Janicek	Email: jjanicek@caerusoilandgas.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 26222 Initial Form 27 Document #: 403178569

#### 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: 1Q 2023 Status Update to Remediation Project Number (RPN) 26222 - Facility Decommissioning

#### SITE INFORMATION

Yes Multiple Facilities

Facility Type: WELL	Facility ID:	API #: 103-10550	County Name: RIO BLANCO
Facility Name: YELLOW CREEK FEDERAL 27-13-1		Latitude: 40.024390	Longitude: -108.385380
		** correct Lat/Long if needed: Latitude:	Longitude:
QtrQtr: NWSW	Sec: 27	Twp: 1N	Range: 98W Meridian: 6 Sensitive Area? Yes
Facility Type: UIC DISPOSAL	Facility ID: 159254	API #:	County Name: RIO BLANCO
Facility Name: YELLOW CREEK UNIT		Latitude: 40.024390	Longitude: -108.385380
		** correct Lat/Long if needed: Latitude:	Longitude:
QtrQtr: NWSW	Sec: 27	Twp: 1N	Range: 98W Meridian: 6 Sensitive Area? Yes

Facility Type:	LOCATION	Facility ID:	316449	API #:		County Name:	RIO BLANCO				
Facility Name:		YELLOW CREEK FEDERAL-61N98W 27NWSW		Latitude:	40.024390	Longitude:	-108.385380				
				** correct Lat/Long if needed: Latitude:		Longitude:					
QtrQtr:	NWSW	Sec:	27	Twp:	1N	Range:	98W	Meridian:	6	Sensitive Area?	Yes

### **SITE CONDITIONS**

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

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**

NA

## 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	Soil Sampling/Laboratory Analytical

### INITIAL ACTION SUMMARY

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

Please reference the initial Form 27 Document Number (DN) 403178569 for information regarding initial assessment activities completed to date.

### 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 ):

Following the cut and capping of the decommissioned wellhead, Yellow Creek Federal 27-13-1, confirmation soil samples from the base and sidewalls of the wellhead footprint will be screened and collected to confirm the removal of impacted soil. When completing future confirmation soil sampling all samples will be inspected for the presence or absence of petroleum hydrocarbon odor/staining and field screening soils using a photoionization detector (PID) to monitor for the presence or absence of volatile organic compounds. All future samples collected in association with the former production equipment will be analyzed under the approved constituents in DN 403178569. All initial samples associated with the decommissioned wellhead will be submitted for COGCC Full Table 915-1.

No assessment activities were completed at the Site during Q1 2023. Activities will commence after winter conditions and wildlife stipulations have subsided in spring/summer 2023.

#### 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 ):

Please see "Proposed Soil Sampling" and "Remediation Summary" sections of the form for additional investigative details.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 0

Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 \_\_\_\_\_

-- Highest concentration of SAR 14.9 \_\_\_\_\_

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

BTEX > 915-1 No \_\_\_\_\_

Approximate areal extent (square feet) 2000 \_\_\_\_\_

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? Yes \_\_\_\_\_

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?

☐ 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?

Please see "Proposed Soil Sampling" and "Remediation Summary" sections of the form for additional investigative details.

### 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.

Since the impacts are considered historical, no source can be identified.

#### REMEDIAL 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.

Once the impacts are delineated, a remediation plan will be presented to the COGCC.

In order to address the elevated arsenic and pH concentrations observed in all facility decommissioning samples a produced water sample from nearby location YELLOW CREEK FEDERAL UNIT-61N98W 35NWSE (YCF 35-33-1) (Location ID:316660) will be collected per Rule 915.e.2.(C) (site-specific waste characterization).

Additional site-specific background soil samples will be collected to address the elevated boron concentrations observed in facility decommissioning soil samples 20220817-YCF 27-13-1 (METER SKID), 20220817-YCF 27-13-1 (PAD VAULT), and 20220817-YCF 27-13-1 (ACCESS RD. VAULT) per Rule 915.e.2.(C).

In order to address the elevated SAR concentrations observed in facility decommissioning soil samples 20220817-YCF 27-13-1 (ACCESS RD. VAULT) and 20220817-YCF 27-13-1 (PH03) @ 6' additional site-specific background soil samples will be collected per Rule 915.e.2.(C).

If the elevated boron and SAR concentrations are not able to be addressed through site-specific background soil concentrations then the exceedances will be addressed through source removal. A representative number of soil samples will be collected from each excavated footprint to confirm the removal of the elevated boron and SAR concentrations.

No assessment activities were completed at the Site during Q1 2023. Activities will commence after winter conditions and wildlife stipulations have subsided in spring/summer 2023.

## Soil Remediation Summary

☐ In Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Other \_\_\_\_\_

☐ Ex Situ

\_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

\_\_\_\_\_ 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.

If groundwater is observed during investigation activities, a representative sample will be collected and submitted for COGCC Table 915-1 constituents for water.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

#### Approved Reporting Schedule:

☒ Quarterly☐ Semi-Annually☐ Annually☐ Other

1Q 2023 Status Update to RPN 26222 - Facility Decommissioning

#### ☐ 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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, Caerus has general liability insurance in the amount of \$1M, and Caerus has umbrella insurance, which sits over the general liability insurance in the amount of \$75M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$76M.

Operator anticipates the remaining cost for this project to be: \$ 20000

### 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:

None

Volume of E&P Waste (solid) in cubic yards 0

E&P waste (solid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels 15

E&P waste (liquid) description impacted soil mixed with hydrovac rinsate

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Greenleaf Environmental Services

## REMEDATION COMPLETION REPORT

### REMEDATION 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.

Any disturbances associated with the facility decommissioning will be returned to grade with suitable material in preparation for final reclamation activities pursuant to the COGCC 1000 Series rules.

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). 08/17/2022

Proposed site investigation commencement. 08/17/2022

Proposed completion of site investigation. \_\_\_\_\_

### 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**

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

Signed: Dustin Held

Title: Sr. Consultant, Geologist

Submit Date: 04/17/2023

Email: Dustin.Held@WSP.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: 05/19/2023

Remediation Project Number: 26222

**COA Type****Description**

0 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**

403360296	FORM 27-SUPPLEMENTAL-SUBMITTED
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Total Attach: 1 Files

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

Environmental	Comply with outstanding COAs.	05/19/2023
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Total: 1 comment(s)