FORM 27 Rev 5/22

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: 403368299
Receive Date:
Report taken by:

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 INFORMATON

Name of Operator: CAERUS PICEANCE LLC Operator No: 10456
Address: 1001 17TH STREET #1600
City: DENVER State: CO Zip: 80202
Contact Person: Jake Janicek Email: jjanicek@caerusoilandgas.com

Phone Numbers
Phone: (970) 778-2314
Mobile: (970) 778-2314

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #:
Initial Form 27 Document #: 403368299

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.
- [X] 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: SPILL OR RELEASE Facility ID: 483962 API #: County Name: RIO BLANCO
Facility Name: J14-496 (15D-14) Flowline Release Latitude: 39.700728 Longitude: -108.136451
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NESW Sec: 14 Twp: 4S Range: 96W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications: GM
Most Sensitive Adjacent Land Use: Rangeland
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

A monitoring well owned by Hunter Ridge Energy Services is located 624 feet northeast.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [X] Produced Water
  - [ ] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	To be determined	Investigation Pending

INITIAL ACTION SUMMARY

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

On March 6, 2023, a lease operator detected gas coming from the area near the 15D-14 wellhead. The equipment was isolated, and the gas leak location was immediately verified as the 15D-14 wellhead. The flowline failure point was identified on March 7, 2023, by daylighting of the area. Form 19 Document 403340060 was submitted to report the release to the Colorado Oil and Gas Conservation Commission (COGCC) and to open Spill/Release Point ID 483962. See the attached Report of Work Completed (ROWC) for details.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Soil samples will be collected to delineate the vertical and horizontal extent of soil impacts. Due to the significant depth to groundwater of greater than 100 feet bgs, Caerus requests to compare results of release investigation to COGCC Table 915-1 Residential Soil Screening Levels as no pathway to groundwater appears to exist. Based on the results of initial site investigation, Caerus proposes a reduced analyte list of total petroleum hydrocarbons (TPH), sodium adsorption ratio (SAR), and hexavalent chromium. Due to Bureau of Land Management (BLM) access stipulations, additional investigation is delated until late Summer 2023.

Proposed Groundwater Sampling

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

Groundwater is not anticipated to be encountered during site investigation activities. If groundwater is encountered, a sample will attempt to be collected for analysis.

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: 6
Number of soil samples exceeeding 915-1: 6
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet): 50

NA / ND

-- Highest concentration of TPH (mg/kg): 4280
-- Highest concentration of SAR: 21.8
BTEX > 915-1: No
Vertical Extent > 915-1 (in feet): 4

Groundwater

Number of groundwater samples collected: 0
Was extent of groundwater contaminated delineated? Yes
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?

☐ 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 Proposed Sampling section and the attached ROWC.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Remediation strategies will be evaluated once impacts are delineated.

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.

On March 14, 2023, initial sampling was completed to characterize the release. A total of five soil samples were collected: one from the excavation base and four from the excavation sidewalls. A composite sample was also collected from the stockpile on site. Soil samples were analyzed for Table 915-1 soil constituents of concern. Analytical results are within COGCC Table 915-1 Residential Soil Screening Levels for all constituents except for TPH, SAR, pH, arsenic, and hexavalent chromium.

Although levels of pH and arsenic above allowable limits remain in the investigation area, background samples collected from native, non-impacted, nearby soil in support of previous remedial investigations at the Location also demonstrate elevated levels of pH and arsenic. Analytical results of background samples demonstrate a native pH level of 8.81 and a native arsenic level of 5.84 milligrams per kilogram. In accordance with COGCC Table 915-1 Footnote 1, Caerus requests alternative allowable limits for pH and arsenic of 8.81 and 5.84 mg/kg, respectively. Assuming the proposed alternative allowable limits are approved, all constituents of concern are within allowable limits except for TPH, SAR, and hexavalent chromium. See the attached ROWC for site investigation details.

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.

Groundwater is not anticipated to be encountered. If groundwater is encountered during site investigation activities, Caerus will attempt to collect a sample for analysis.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] 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

[X] Other Q1 2023 Status Update

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: $ 25000

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.

Any disturbance will be returned to the active working surface of the well pad for continued operation. When the site is decommissioned at a later date, it will be reclaimed in accordance with 1000 Series regulations.

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?

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. 03/06/2023

Actual Spill or Release date, or date of discovery. 03/06/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/14/2023

Proposed site investigation commencement. 03/14/2023

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

This form has been submitted to open a Remediation Project Number for Spill/Release Point ID 483962, to report results of initial site investigation to the COGCC, to propose additional site investigation, and to request a reduced analyte list. See the attached ROWC for site investigation details.

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

Signed: Sage Maher Title: Project Manager

Submit Date: Email: sage.maher@confluence-cc.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: Date:

Remediation Project Number:

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
403424179	SITE INVESTIGATION REPORT

Total Attach: 1 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)