

# 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:

403400430

Receive Date:

05/12/2023

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>	<b>Phone Numbers</b>
Address: <u>910 LOUISIANA ST STE 4200</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>	
		Phone: <u>(832) 6086137</u>
		Mobile: <u>(713) 2923472</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 29656 Initial Form 27 Document #: 403400430

#### 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>479880</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>A18E Pipeline</u>	Latitude: <u>39.451480</u>	Longitude: <u>-107.703746</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>18</u>	Twp: <u>7S</u>	Range: <u>92W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

#### SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? No

Is groundwater less than 20 feet below ground surface? No

## 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	56'L X 21'W X 20'D	visual, excavation, field screening

### 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 form 19:

During the course of line inspection, Grand River Gathering (GRG) personnel noticed odors consistent with natural gas. Upon further inspection GRG personnel identified location of leak. GRG personnel immediately isolated affected line and blew down. GRG environmental response personnel were notified. Affected area has been contained, Emergency OneCalls have been completed and HydroVac has been scheduled to visually identify point of release and recover potentially impacted surface soils. Delineation of impacts and remediation per applicable series 900 rules, including table 915.

Gathering line was excavated and repaired in May 2021.

### 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 ):

Grand River Gathering plans to file a 915b reclamation plan for the existing inorganic impacts at this Site. If that reclamation plan is unsuccessful then Grand River Gathering will collect additional backgrounds to better characterize native soil conditions.

#### 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 ):

Produced water sampling is required to understand the nature of produced fluids in terms of pH and Arsenic.

## SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 5  
Number of soil samples exceeding 915-1 2  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 1176

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 11.7  
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?

Two background samples were collected. Please see previously submitted documents 403395434 and 403395541 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?

## REMEDIAL ACTION PLAN

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Gathering line was excavated and repaired in May 2021.

### 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.

Grand River Gathering plans to file a 915b reclamation plan for the existing inorganic impacts at this Site. If that reclamation plan is unsuccessful then Grand River Gathering will collect additional backgrounds to better characterize native soil conditions.

### 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.

Grand River Gathering plans to file a 915b reclamation plan for the existing inorganic impacts at this Site, If that reclamation plan is unsuccessful then Grand River Gathering will collect additional backgrounds to better characterize native soil conditions.

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). 05/12/2021

Proposed site investigation commencement. \_\_\_\_\_

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 Site was excavated and sampled in May 2021. The results of this sampling event indicate exceedances in Arsenic, SAR, and pH at this Site. Please see previously submitted documents 403395434 and 403395541 for details. Grand River Gathering will sample produced water to better understand the source of the Arsenic and pH impacts observed.

Grand River Gathering plans to file a 915b reclamation plan for the existing inorganic impacts at this Site. If that reclamation plan is unsuccessful then Grand River Gathering will collect additional backgrounds to better characterize native soil conditions.

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: 05/12/2023

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: 06/13/2023

Remediation Project Number: 29656

**COA Type****Description**

	Submit Supplemental eForm 19 to request closure of Spill/Release ID #479880. 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.
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**

403400430	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403431644	FORM 27-INITIAL-SUBMITTED

Total Attach: 2 Files

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

Environmental	Approval of this Initial Form 27 does not constitute endorsement of the Operator's proposed Rule 915.b reclamation plan. Operator is welcome to submit the request but additional soil sampling may be required to delineate documented arsenic, SAR, and pH exceedances per Rule 913.b.(2).	06/13/2023
---------------	--	------------

Total: 1 comment(s)