

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403414146
Receive Date:
06/02/2023

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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 902-3598
City: DENVER State: CO Zip: 80202		Mobile: (970) 902-3598
Contact Person: Andy Verbonitz	Email: averbonitz@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30040 Initial Form 27 Document #: 403414146

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: SPILL OR RELEASE	Facility ID: 484199	API #: _____	County Name: GARFIELD
Facility Name: K25 #WF04BK25596	Latitude: 39.584165	Longitude: -108.118991	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: nesw	Sec: 25	Twp: 5s	Range: 96w Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Riparian
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

West Fork Parachute Creek is located approximately 270 feet north of the Location. Several groundwater monitoring wells are within 0.25 miles of the Location, but none are domestic groundwater wells.

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	To be determined	Soil sampling and laboratory analysis

INITIAL ACTION SUMMARY

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

This form has been submitted to open a Remediation Project Number for Spill/Release Point ID 484199. See the attached Report of Work Completed (ROWC) for release investigation details.

On April 9, 2023, the operator identified a flowline leak at the Location. An unknown volume of produced water and condensate was released from the flowline. The release was reported via Colorado Oil and Gas Conservation Commission (COGCC) Form 19 Document 403368719 to open Spill/Release Point ID 484199.

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):

Caerus has collected soil samples in an effort to characterize soil impacts associated with the release. Caerus will collect additional soil samples as needed to delineate the vertical and horizontal extent of contamination in accordance with COGCC Table 915-1 Residential Soil Screening Levels. Based on the results of site investigation to date, Caerus requests a reduced analyte list of total petroleum hydrocarbons (TPH), xylenes, 1,2,4 trimethylbenzene, 1,3,5 trimethylbenzene, naphthalene, sodium adsorption ratio (SAR), and hexavalent chromium.

Proposed Groundwater Sampling

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

Groundwater is not expected to be encountered. If groundwater is encountered, Caerus will attempt to collect a representative groundwater sample for laboratory 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 exceeding 915-1 6
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 360

NA / ND

-- Highest concentration of TPH (mg/kg) 4503
-- Highest concentration of SAR 14.4
BTEX > 915-1 Yes
Vertical Extent > 915-1 (in feet) 6

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 the Proposed Sampling section and the attached ROWC.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Caerus is in the process of determining the extent of contamination associated with the project. Once the extent of contamination is determined, Caerus will prepare a remediation plan to remove the source material within the release area.

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 April 17, 2023, initial sampling was performed to characterize the point of release (POR). Six soil samples were collected from the excavation: one from the base of the excavation directly beneath the POR at 6 feet below ground surface (bgs), one from each sidewall at 4 feet bgs, and one composite sample from associated stockpiles on site. Analytical results of excavation samples indicate compliance with COGCC Table 915-1 Residential Soil Screening Levels except for TPH, xylenes, 1,2,4- trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, SAR, pH, arsenic, and hexavalent chromium.

On October 27, 2021, several background samples were collected at the Location in support of a separate remediation project from nearby, native, non-impacted soil. Analytical results of these background samples indicate native levels of pH and arsenic exceeding COGCC Table 915-1 Residential Soil Screening Levels. Caerus requests alternative allowable limits for pH and arsenic of 8.81 and 33.1 milligrams per kilograms (mg/kg), respectively, in accordance with COGCC Table 915-1 Footnote 1. See the attached ROWC for 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 characterization.

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 Q2 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: \$ 60000

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.

Caerus will return the excavation to the active working surface of the well pad for continued use.

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. 04/09/2023

Actual Spill or Release date, or date of discovery. 04/09/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/17/2023

Proposed site investigation commencement. 04/17/2023

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 provide Q2 2023 site investigation data to the COGCC, to open a Remediation Project Number for Spill/Release Point 484199, and to request a reduced analyte list. Please find 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: 06/02/2023

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: Steven Arauza

Date: 07/03/2023

Remediation Project Number: 30040

COA Type**Description**

	Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements.
	Operator shall collect soil samples from areas most likely to be impacted and shall collect an appropriate number of representative soil samples to delineate the horizontal and vertical extents of contamination, per Rule 915.e.(2).B.
	Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater. The Operator shall analyze samples for the approved analyte list and shall compare analytical results for site investigation samples to the Table 915-1 Residential Soil Screening Level Concentrations.
	Submit Supplemental eForm 19 to request closure of Spill/Release ID #484199. 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.
4 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**

403414146	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403421430	SITE INVESTIGATION REPORT
403452370	FORM 27-INITIAL-SUBMITTED

Total Attach: 3 Files

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

Environmental	Based on the information provided for background samples (doc #403421430), the Operator's request for alternative allowable limits of 8.81 for pH and 33.1 mg/kg for arsenic is conditionally approved.	07/03/2023
Environmental	Based on the information provided for confirmation samples (doc #403421430), the Operator's request for a reduced analyte suite of total petroleum hydrocarbons (TPH), xylenes, 1,2,4 trimethylbenzene, 1,3,5 trimethylbenzene, naphthalene, sodium adsorption ratio (SAR), and hexavalent chromium is conditionally approved.	07/03/2023

Total: 2 comment(s)