

State of Colorado Energy & Carbon Management Commission

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Receive Date:

08/15/2023

Report taken by:

Krystal Heibel

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: WESTERN OPERATING COMPANY	Operator No: 95620	Phone Numbers Phone: (303) 726-8650 Mobile: ()
Address: 1165 DELAWARE STREET #200		
City: DENVER	State: CO Zip: 80204	
Contact Person: Steve James	Email: steve@westernoperating.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 26893 Initial Form 27 Document #: 403124055

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

Yes Multiple Facilities

Facility Type: PIT	Facility ID: 100315	API #: _____	County Name: LOGAN
Facility Name: ROBERTS 1		Latitude: 40.904319	Longitude: -103.342207
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: NWNW	Sec: 30	Twp: 11N	Range: 53W Meridian: 6 Sensitive Area? No

Facility Type: WELL	Facility ID: _____	API #: 075-06999	County Name: LOGAN
Facility Name: ROBERTS 1		Latitude: 40.904210	Longitude: -103.342430
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: NWNW	Sec: 30	Twp: 11N	Range: 53W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION	Facility ID: 312230	API #:	County Name: LOGAN
Facility Name: ROBERTS-611N53W 30NWNW	Latitude: 40.904210	Longitude: -103.342430	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNW	Sec: 30	Twp: 11N	Range: 53W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications SM 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

The Robert 1 wellhead is surrounded by vacant land in all directions. There are no residences within a quarter mile of the wellhead. There is one residential groundwater well permit (45215) mapped 0.45 miles northeast of the wellhead and reported a static water level of 313 feet below ground surface at the time of completion. There is surface water mapped within a quarter mile of the Site. There are no additional sensitive areas or wildlife habitats identified within a quarter mile 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
UNDETERMINED	SOILS	No known impacts	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.

Western Operating proposes to plug and abandon (P&A) the Roberts 1 well and decommission the related tank battery facility. Cut and cap activities and removal of production facility equipment are planned to commence approximately 10 days after P&A activities are complete. Western Operating will conduct site investigation activities, field screening, and confirmation soil sampling activities during closure of each qualifying production equipment type in accordance with COGCC 900 Series Rules. Discreet soil samples and, if necessary, groundwater samples, will be collected and analyzed pursuant to Rule 915, following the general sample collection guidance in Rule 915.e.(2) and Rule 915.e.(3). Western Operating will completely remove flowlines with landowner approval and will conduct flowline abandonment activities in accordance with COGCC 1105 Series Rules. Pit closure samples will be collected in accordance with Rule 911.c. Pit Closure Guidance document. All waste generated during the closure activities will be managed and disposed of in accordance with Rules 905 and 906. See the attached Figure 1 for an illustration of the location of the Site.

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):

A minimum of 13 discreet soil samples will be collected for field screening from qualifying production equipment. At least seven samples will be submitted to accredited laboratory for analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-trimethylbenzene and TPH. One wellhead sidewall sample, one produced water tank floor sample, and one produced water tank sidewall sample will additionally be analyzed for EC, SAR, pH and boron. Discrete soil samples will be field-screened from along the removed flowline path and submitted if impacts are suspected. Samples collected from areas most likely to have been impacted during the life of the flowline, in accordance with COGCC Operator Guidance Rule 911.a.(4), will be submitted for analysis of BTEX, naphthalene, 1,2,4- and 1,3,5-trimethylbenzene, TPH, EC, SAR, pH and boron. Flowline confirmation samples may be collected jointly with required qualifying production equipment samples. See the attached Figure 2.

Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of BTEX, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260.

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):

A minimum of 8 soil samples will be collected from the earthen pit. A five-point composite sample will be collected from each of the four berms and submitted for laboratory analysis of EC, SAR, pH, and boron. Grab samples from the floor of the pit will be collected from approximately 1 foot (ft) and 3ft below ground surface (bgs) at four discrete locations. Shallow floor samples will be submitted for BTEX, naphthalene, 1,2,4- and 1,3,5-trimethylbenzene, TPH, EC, SAR, pH, and boron. Deeper floor samples will be held at the laboratory pending results of shallow sampling. Additionally, confirmation soil samples will be collected from the center of an area identified in historical imagery as a potential earthen pit. Grab samples will be collected at approximately 1ft and 3ft bgs and at least one sample submitted for EC, SAR, pH, and boron. See the attached Figure 2 Proposed Soil Sampling Location Diagram.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0

Number of soil samples exceeding 915-1

Was the areal and vertical extent of soil contamination delineated? _____

Approximate areal extent (square feet) _____

NA / ND

_____ Highest concentration of TPH (mg/kg) _____

_____ Highest concentration of SAR _____

_____ BTEX > 915-1 _____

_____ Vertical Extent > 915-1 (in feet) _____

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?

☐ 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.

If a suspected release is identified through soil screening and/or laboratory analysis, soils may be removed and transported to a licensed disposal facility. If all source material cannot be removed during excavation activities, alternative plans will be proposed in subsequent Form 27 supplemental.

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.

As needed, a remediation or closure plan will be developed based on the results of the confirmation soil sampling results and submitted to COGCC via Supplemental Form 27.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

_____ 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.

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:

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?

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.

Reclamation activities will be completed in accordance with 1000 Series Rules, in collaboration with the landowner.

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). 08/02/2022

Proposed site investigation commencement. 09/01/2023

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 27 Supplemental has been prepared as a quarterly update. Plugging and abandonment of the wellhead is scheduled for 3rd quarter 2023. The landowner will be notified prior to plugging and abandonment activities. Follow-up reporting will be submitted via a Form 27 Supplemental within 90 days after work is completed.

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

Signed: Ryan Finley

Title: Senior Project Geologist

Submit Date: 08/15/2023

Email: rfinley@entradainc.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: Krystal Heibel

Date: 09/21/2023

Remediation Project Number: 26893

COA Type**Description**

	Per Doc #403366382, Operator shall include photo documentation of the surface areas, wellhead excavation and sample locations on the subsequent Supplemental Form 27.
	This Form 27 Supplemental is being approved as submitted. However, the next Form 27 Supplemental must be populated with the Adequacy of Operator's General Liability Insurance and Financial Assurance data field under the Remediation Progress Update tab to describe how Operator's Financial Assurance meets the requirements of Rule 703.b. and General Liability Insurance meets the requirements of Rule 705.b.
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2). Operator will analyze every soil sample collected for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
	Per Doc #403366382, if impacted soils are encountered during cut and cap operations, or during flowline removal, the impacted soil will be segregated for proper off site disposal and the lateral and vertical extent of impact determined with appropriate confirmation soil sampling, and Operator will expand analyte list to include Table 915-1 contaminants of concern.
	Per Doc #s 403124055 & 403366382, "on the subsequent Supplemental Form 27, Operator shall populate the Implementation Schedule section to indicate the Date of Surface Owner notification/consultation and update the Site Investigation Dates."
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**

403498020	FORM 27-SUPPLEMENTAL-SUBMITTED
403498025	MAP
403498027	SITE MAP

Total Attach: 3 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	"This Form 27 Supplemental has been prepared as a quarterly update. Plugging and abandonment of the wellhead is scheduled for 3rd quarter 2023. The landowner will be notified prior to plugging and abandonment activities. Follow-up reporting will be submitted via a Form 27 Supplemental within 90 days after work is completed."	09/20/2023

Total: 1 comment(s)