

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
403517387
Receive Date:
09/06/2023

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: CITATION OIL & GAS CORP	Operator No: 17180	Phone Numbers Phone: (281) 891-1550 Mobile: (713) 702-7534
Address: 14077 CUTTEN RD		
City: HOUSTON	State: TX	Zip: 77069
Contact Person: Bob Redweik	Email: BRedweik@cogc.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 24026 Initial Form 27 Document #: 402820669

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: 480165	API #: _____	County Name: LOGAN
Facility Name: Dubois Tank Battery	Latitude: 40.774699	Longitude: -103.221102	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 7	Twps: 9N	Range: 52W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Livestock Grazing
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

Other Potential Receptors within 1/4 mile

The nearest surface water feature to the Site is the North Sterling Outlet Canal. This canal is approximately 0.24 miles from the south side of the Site, which is the nearest it comes to the location, but the canal is present on the site's east, west, and south sides. A review of Colorado's DWR Well Permit Resource data identified two domestic water wells approximately 0.12 miles and 0.13 miles from the Site, indicating depth to non-alluvial groundwater to be 60 feet and 40 feet bgs. A total of 6 wells are located within 0.5mi of the site. An occupied building with livestock is located approximately 370 feet northeast of the site. The facility is located within the Mule Deer severe winter range CPW HPH. Two freshwater pond wetlands are located approximately 50 feet south-southeast of the facility.

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	Confirmation soil sampling

INITIAL ACTION SUMMARY

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

Citation removed all fluid and visually impacted soils from the spill location between 6/11/21 and 6/21/21. Absaroka sampled release on 6/23/21. The soil sampling activity and results are reported in Form 19 document number 402785100.

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):

Citation will conduct complete soil sampling across the site, including former pit locations to the southeast of the site as the facility is being decommissioned entirely. Samples will be collected from all locations where equipment was situated, as well as beneath the cattle guard in the southwest corner of the facility. In addition, soil borings will be advanced in the former pit locations to collect adequate subsurface sampling. At least 13 soil sample locations are proposed, and multiple samples may be collected from various depths within the borings. At least 5 borings will be advanced in the former pit areas. Investigation samples will be analyzed in accordance with Table 915-1. Soil samples will also be collected from at least two upgradient/cross-gradient locations to establish background conditions with respect to EC, SAR, pH, boron and metals.

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):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 23

Number of soil samples exceeding 915-1 22

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

Approximate areal extent (square feet) 5000

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 78.1

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 2

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 _____

ND Highest concentration of Benzene (µg/l) _____

ND Highest concentration of Toluene (µg/l) _____

ND Highest concentration of Ethylbenzene (µg/l) _____

ND Highest concentration of Xylene (µg/l) _____

ND 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 (2) background samples were collected from adjacent, upgradient, unaffected areas east and west of the site, and analyzed for EC, SAR, pH, boron, and metals.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 310

Volume of liquid waste (barrels) 399

Is further site investigation required?

Additional sampling to evaluate soil suitability conditions and potential in-situ remediation applicability to address the boron and SAR exceedances are being evaluated.

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.

Following completion of the complete site investigation and delineation, Citation will remove any additional sources of contaminants not previously removed as part of the facility decommissioning.

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.

Citation will develop and implement a site-specific remediation strategy. This strategy will include excavation and disposal of highly impacted materials within the near surface soils, and possible treatment and/or burial at depth (below growing horizon/root zone) to address the SAR and boron exceedances in the form pit area(s). Non-hydrocarbon impacts such as EC, SAR or metals may be left in place following additional excavation & sampling if they do not occur in conjunction with hydrocarbons and they are below the root zone, and hence would not affect reclamation potential. Additional sampling shall be conducted to delineate elevated levels of soil suitability constituents.

Soil Remediation Summary

In Situ

Ex Situ

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

Yes _____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____ 2000
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.

Citation carries general liability insurance of \$2,000,000, with excess liability insurance of \$35,000,000. Citation also carries pollution/waste liability insurance of \$20,000,000, and environmental related liability insurance of \$3,000,000 for all active wells and \$1,000,000 for all plugged and abandoned wells. Citation maintains \$1,135,000 in surety bonds with the COGCC. There is no site-specific financial assurance associated with this remediation project. Citation does not intend to file an insurance claim for this remediation project.

Operator anticipates the remaining cost for this project to be: \$ 50000

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:

All E&P waste generated thusfar has been disposed at Pawnee Waste, LLC. Additional removal and disposal activities will continue. 310 cubic yards of soil have been removed for disposal.

Volume of E&P Waste (solid) in cubic yards 310

E&P waste (solid) description Soil impacted by crude oil and produced water

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Pawnee Waste, LLC

Volume of E&P Waste (liquid) in barrels 399

E&P waste (liquid) description Produced water and crude oil

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Pawnee Waste, LLC

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.

The area will be contoured to match the topographic landscape. The Site will then be seeded with a landowner-approved seed mix.

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/25/2022

Proposed site investigation commencement. 09/23/2022

Proposed completion of site investigation. 11/01/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/27/2022

Proposed date of completion of Remediation. 11/30/2023

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 is intended as a 3Q23 update for this remediation project. Additional sampling shall be conducted to vertically and laterally delineate elevated levels of soil suitability constituents. Once delineated, a remediation plan shall be submitted and implemented pending ECMC approval.

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

Signed: Randolph Moses

Title: Agent

Submit Date: 09/06/2023

Email: randolph.moses@absarokasolutions.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: 09/29/2023

Remediation Project Number: 24026

COA Type**Description**

	Operator shall provide soil sample analytics in the next Form 27 submittal, along with a "Soil Sample Location Map" illustrating where each sample was collected.
	Operator shall not dispose of any impacted materials on location.
	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.
3 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**

403517387	FORM 27-SUPPLEMENTAL-SUBMITTED
-----------	--------------------------------

Total Attach: 1 Files

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

Environmental	"This form is intended as a 3Q23 update for this remediation project. Additional sampling shall be conducted to vertically and laterally delineate elevated levels of soil suitability constituents. Once delineated, a remediation plan shall be submitted and implemented pending ECMC approval." ... "Additional sampling to evaluate soil suitability conditions and potential in-situ remediation applicability to address the boron and SAR exceedances are being evaluated."	09/28/2023
---------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------

Total: 1 comment(s)