

State of Colorado Energy & Carbon Management Commission

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403479924

Receive Date:

08/07/2023

Report taken by:

Laurel Anderson

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>NATURAL RESOURCE GROUP INC</u>	Operator No: <u>10369</u>	Phone Numbers
Address: <u>801 WEST MINERAL AVE STE 202</u>		Phone: <u>(303) 894-2100</u>
City: <u>LITTLETON</u> State: <u>CO</u> Zip: <u>80120</u>		Mobile: <u>(303) 905-5341</u>
Contact Person: <u>James Hix - East OWP EPS</u>	Email: <u>james.hix@state.co.us</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 31922 Initial Form 27 Document #: 403479924

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: <u>WELL</u>	Facility ID: _____	API #: <u>014-08759</u>	County Name: <u>BROOMFIELD</u>
Facility Name: <u>SHANNON-ROBERTS (OWP) 2</u>	Latitude: <u>40.023968</u>	Longitude: <u>-104.963784</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>26</u>	Twp: <u>1N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>335762</u>	API #: _____	County Name: <u>BROOMFIELD</u>
Facility Name: <u>SHANNON-ROBERTS-61N68W 26SENE</u>	Latitude: <u>40.023808</u>	Longitude: <u>-104.963784</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENE</u>	Sec: <u>26</u>	Twp: <u>1N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Wetlands

Is domestic water well within 1/4 mile? Yes

Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

Domestic Water well (DWR Permit #92254) ~680 ft SE of location, No CPW mapped HPH, freshwater emergent wetlands mapped ~1/4 mile NW along unnamed tributary to Dry Creek and Community Ditch Levee

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	GROUNDWATER	UNKNOWN	Visually, Field Screening, Analytical Results
UNDETERMINED	SOILS	UNKNOWN	Visually, Field Screening, Analytical Results

INITIAL ACTION SUMMARY

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

The Shannon Roberts (OWP) #2 well and SHANNON-ROBERTS 61N68W 26SENE are in the ECMC Orphaned Well Program. The well is to be plugged and abandoned. Soil samples will be collected from the sidewalls and base of the wellhead excavation following cut and cap operations.

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):

Grab soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 parameters including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds (metals, soil suitability for reclamation).

Proposed Groundwater Sampling

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

If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

Proposed Surface Water Sampling

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

Surface water samples are not expected to be collected as part of this investigation.

Additional Investigative Actions

☐ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

No additional alternative investigative actions are expected to be conducted as part of this site investigation.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0

Number of soil samples exceeding 915-1

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

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

BTEX > 915-1 _____

Approximate areal extent (square feet) _____

Vertical Extent > 915-1 (in feet) _____

Groundwater

Number of groundwater samples collected _____ 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No _____

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If E&P Waste impacts are encountered during decommissioning of Oil and Gas Facilities, impacted soils will be excavated, temporarily stockpiled on location, and hauled to a commercial disposal facility.

REMEDIAL ACTION 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.

If E&P Waste impacted soils are encountered, the soils will be excavated and removed. If the horizontal and vertical extent of the E&P Waste impacts cannot be defined or removed during this initial action, then additional site investigation and remediation will be performed at a later date under an approved supplemental Form 27. Site data will be evaluated and remediation technologies implemented to meet full Table 915-1 soil residential screening levels, protection of groundwater screening levels, or Table 915-1 groundwater and WQCC Regulation 41 numeric and narrative levels as applicable to site 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

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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

A supplemental Form 27 will be submitted within 90 days of receipt of analytical results.

☐ 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.

This well and location are in the ECMC Orphaned Well Program.

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.

The ECMC OWP will reclaim this oil and gas location in accordance with 1000 Series Rules including grading/recontouring of disturbed areas, the method and testing of compaction alleviation, and development of a reseeding program that describes new seed, seed mix, and noxious weed prevention. This will be performed under a separate scope of work. Final reclamation will be conducted per reclamation rules (Rule 1004) and prioritized based on OWP funding and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

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). 08/14/2023

Proposed site investigation commencement. 08/14/2023

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

The NATURAL RESOURCE GROUP INC. - 10369 SHANNON-ROBERTS (OWP) 2 and SHANNON-ROBERTS-61N68W 26SENE Location (Location ID #335762) are in the ECMC Orphaned Well Program (OWP). This well will be plugged and abandoned and soil samples will be collected for full Table 915-1 parameters following cut and cap activities. If encountered, a grab groundwater sample will be collected and submitted for Table 915-1 water parameters.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 08/07/2023

Email: james.hix@state.co.us

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: Laurel Anderson

Date: 10/05/2023

Remediation Project Number: 31922

COA Type**Description**

	OWP shall conduct the closure investigation, documentation and reporting in accordance with the Rule 911.a.(4) - Oil and Gas Facility Closure and Rule 915.e.(2) Guidance Documents.
	OWP shall provide information about the flowlines: Clarify their intended plans with removal or abandonment-in-place, if the flowlines are on-location or off-location, and indicate what documentation will be provided to ECMC. If necessary OWP shall add the off-location flowline to the "facility types" under "Site Information" for future form submittals.
	OWP shall submit a "Soil Sampling Location Map" that includes at minimum: an aerial image with a scale that depicts proposed field screening locations, soil sample(s) location(s), and background sample(s) location(s) if proposed.
	If impacted soils are encountered during closure activities, the impacted soil shall be properly stored (including segregation), handled, transported and disposed in accordance with Rules 902.a, 902.b., 902.c., 905.b. and 905.e. in order to prevent pollution, adverse environmental impacts and the potential for unauthorized discharge of oil, condensate, gas, and/or other E&P Waste.
	If OWP proposes the use of Residential Soil Screening levels, OWP shall submit a Supplemental Form 27 with a detailed evaluation of site-specific information as outlined in the Rule 915.a Soil Concentrations - Determination of Pathway to Groundwater guidance document for ECMC EPS review in making a determination if a pathway to Groundwater is present. Operator shall abide by protection of groundwater soil screening levels until such determination can be made.
	OWP shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27. If changes are necessary, changes can be made of future submittals. If closure activities are delayed beyond 90 days from the proposed start date, OWP shall submit a Supplemental Form 27 with the newly proposed start date. If the proposed start date is unknown OWP shall submit a Supplemental Form 27 indicating the start date is unknown and provide an additional Supplemental Form 27 with an updated Implementation Schedule at least 14 days in advance of any scheduled work.
6 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**

403479924	INVESTIGATION/REMEDIATION WORKPLAN (INITIAL)
403487961	MAP
403487963	SITE MAP

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)