

# State of Colorado Energy & Carbon Management Commission

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403490516

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08/10/2023

Report taken by:

Chris Sanchez

## 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	<b>Phone Numbers</b>
Address: 14077 CUTTEN RD		Phone: (281) 891-1550
City: HOUSTON State: TX Zip: 77069		Mobile: (713) 702-7534
Contact Person: Bob Redweik	Email: BRedweik@cogc.com	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 28872 Initial Form 27 Document #: 403344790

#### 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: Plugging and Abandonment

#### SITE INFORMATION

Yes Multiple Facilities

Facility Type: WELL	Facility ID:	API #: 017-07027	County Name: CHEYENNE
Facility Name: BILL 32-26 5		Latitude: 38.894741	Longitude: -102.079439
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWNE	Sec: 26	Twp: 13S	Range: 42W Meridian: 6 Sensitive Area? Yes

  

Facility Type: LOCATION	Facility ID: 321813	API #:	County Name: CHEYENNE
Facility Name: BILL 32-26-613S42W 26SWNE		Latitude: 38.894741	Longitude: -102.079439
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWNE	Sec: 26	Twp: 13S	Range: 42W Meridian: 6 Sensitive Area? Yes

## **SITE CONDITIONS**

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Agriculture

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**

Surface water is present in the area in the form of ephemeral streams and small reservoirs. The closest surface water feature to the site is an unnamed ephemeral drainage to the Smoky Hill River. The Smoky Hill River is an ephemeral drainage to Cedar Bluff Reservoir, which is a perennial water body. The unnamed drainage feature is approximately 635 feet to the east of the well site and the Smoky Hill River is approximately 2,109 feet to the north of the well site. The closest perennial water body is Cedar Bluff Reservoir which is more than 118 miles downstream of the site. This site is located within the extents of the Colorado Parks and Wildlife (CPW) High Priority Habitat (HPH) designated for Winter Concentration Area and Severe Winter Range for Mule Deer.

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             |  |
| <input checked="" type="checkbox"/> Oil            | <input type="checkbox"/> Tank Bottoms                |  |
| <input type="checkbox"/> Condensate                | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids           | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings            | <input type="checkbox"/> Spent Filters               |  |
|  | <input type="checkbox"/> Pit Bottoms                 |  |
|  | <input type="checkbox"/> Other (as described by EPA) |  |

### DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Undetermined	To be determined

### 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 is a site investigation to determine if impacts are present.

### 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 ):

Two (2) grab soil samples will be collected as described in the attached proposed sample location diagram. One (1) background sample will be collected from an adjacent, upgradient location. All grab samples will be analyzed for full Table 915-1 listed constituents. The background sample will be analyzed for 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 ):

Soil on location will be field screened with PID and EC probe.

## 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

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

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.

Pending results of the site investigation.

### REMEDICATION 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.

Remediation activities for substantial impacts, if required, will likely involve the excavation of impaired soils for transport to an approved disposal facility. Following excavation and removal of any impacted soils, confirmation sampling will be conducted to confirm successful remediation. Excavated areas will then be backfilled with clean soil as necessary and seeding of the remediated area to re-establish a proper seedbed will be conducted.

### 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

**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 Oil and Gas Corp 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: \$ 10000

### 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.

A reclamation plan will be prepared pending the outcome of the site investigation.

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). 04/03/2023

Proposed site investigation commencement. 09/01/2023

Proposed completion of site investigation. 10/01/2023

### 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**

Citation has plugged the well at this location and is currently in the process of facility decommissioning. Site investigation and confirmation sampling activities shall be completed as soon as practical, and are anticipated to take place within 30 - 60 days.

Associated forms will be submitted upon investigation plan completion.

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: 08/10/2023

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: Chris Sanchez

Date: 10/09/2023

Remediation Project Number: 28872

**COA Type****Description**

	Properly abandon flowlines per Rule 1105. If flowlines will be abandoned in place, include with the Form 27: pressure test results conducted in the prior 12 months as well as identification of any document numbers for a ECMC Spill/Release Report, Form 19, associated with the abandoned line.
	Per Rule 911.b. If an Operator discovers a Spill or Release during closure operations, the Operator will report the Spill or Release on a Form 19, Spill/Release Report, pursuant to Rule 912.
	IMPACTS DISCOVERED DURING CLOSURE: If impacted soils are encountered during cut and cap operations, or during flowline removal, the impacted soil will be segregated for proper offsite disposal and the lateral and vertical extent of impact determined with appropriate confirmation soil sampling. If impacted soil indicative of a Spill/Release is discovered during field screening the lateral and vertical extent of impact will be determined with appropriate confirmation soil sampling. Housekeeping and de minimis amounts of stained soil removed
	Operator shall submit Quarterly Updates for this remediation project every 90 days as required by Rule 913.e. Quarterly updates shall include a current map of the subject location including current excavation limits and/or sample locations, proposed/actual soil boring locations and monitoring well locations. GPS data used to create the map must comply with ECMC Rule 216. Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit field notes of all field activities reported during a Quarterly Update.
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples 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)).
	If encountered operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to the Organic Compounds listed.

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**

403490516	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403490616	SITE INVESTIGATION PLAN
403554260	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

Date Run: 10/9/2023 Doc [#403490516]

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## General Comments

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

Total: 0 comment(s)