

# State of Colorado Energy & Carbon Management Commission

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Receive Date:

Report taken by:

## 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: <u>ANSCHUTZ EXPLORATION CORP</u>	Operator No: <u>3104</u>	<b>Phone Numbers</b>
Address: <u>555 17TH ST STE 2400</u>		Phone: <u>(303) 299-1599</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>(720) 925-1820</u>
Contact Person: <u>Schuyler Hamilton</u>	Email: <u>Schuyler.Hamilton@aec-denver.com</u>	

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 26721 Initial Form 27 Document #: 403265956

#### 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: <u>PIT</u>	Facility ID: <u>269711</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>PRF C-1W</u>	Latitude: <u>40.212478</u>	Longitude: <u>-108.276279</u>	
** correct Lat/Long if needed: Latitude: <u>40.212534</u>		Longitude: <u>-108.276615</u>	
QtrQtr: <u>NESE</u>	Sec: <u>21</u>	Twp: <u>3N</u>	Range: <u>97W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

#### SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Rangeland

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

**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	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 Initial Form 27 is being submitted to open a Remediation Project Number associated with closure of COGCC Pit ID: 269711. Initial characterization efforts include soil and groundwater (if pathway to groundwater is determined) characterization in accordance with 900 Series Rules.

**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 ):

Additional delineation sampling will be completed to delineate extents of impacts discovered when performing sampling of the emergency pit. Additional sampling plan will be submitted in subsequent form. Anschutz respectfully requests a reduced analyte list of TPH. Please see remediation summary and report of work completed.

**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 ):

Additional investigative actions will be conducted to delineate impacts associated with initial sampling of emergency pit.

**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) 2500

**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

**NA / ND**

-- Highest concentration of TPH (mg/kg) 15.61

-- Highest concentration of SAR 45.3

BTEX &gt; 915-1 No

Vertical Extent &gt; 915-1 (in feet) 7

**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?

Background samples will be evaluated as part of the remediation project #23348.

☐ 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?

Additional site investigation will be conducted to delineate impacts and complete closure of the pit.

**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.

Upon final delineation of impacts, a remediation strategy will be proposed in a supplemental form 27.

**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.

In July 2023, initial sampling efforts were completed to determine closure of the produced water emergency pit. Results indicated that there are impacts related to oil and gas activity.

Four additional soil borings were advanced around the Location in native, non-impacted soil to further characterize native levels of inorganic constituents. Twelve soil samples were collected from the background investigation borings. Analytical results of background soil samples exceed ECMC Table 915-1 RSSLs for electrical conductivity (EC), SAR, pH, arsenic, and hexavalent chromium.

On October 3, 2023, a produced water characterization sample was collected from a produced water tank at the Location. Analytical results of the produced water characterization indicate an arsenic value below laboratory detection limits and near-neutral pH at 6.46.

Background sample (SB18) taken in coordination with Remediation 23348 indicates that native EC (8.5510 mmhos/cm), SAR (18.8) and hexavalent chromium (0.453 mg/kg) all have elevated levels. SB18 is located within the same soil type (Kobase silty clay loam) and sample was collected at a similar elevation level. Anschutz respectfully requests consideration of Table 915-1 Footnote 1 to amend allowable limits for EC, SAR, and hexavalent chromium to those found in SB18 (EC-8.510mmhos, SAR-18.8, hexavalent chromium-0.453mg/kg).

Pit sampling indicated elevated levels of pH and arsenic, both exceeding Table 915-1 RSSLs. A produced water characterization sample was taken at the storage tanks. Results of the characterization sample indicate that both arsenic (non-detect) and pH (6.46) are not elevated at the source. Anschutz respectfully requests to remove pH and arsenic as constituents of concern.

## **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.

## 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 Q3 2023 Quarterly 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.

Estimation of project for any disposal, lab, and 3rd party contractor fees, estimation is \$20,000 for project. In the event that impacts are discovered, Remaining costs will be updated.

Operator anticipates the remaining cost for this project to be: \$ 20000

### 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.

All disturbance areas will be returned to grade with suitable material in preparation for final reclamation activities pursuant to the COGCC 1000 Series Rules.

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. 07/13/2023

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 satisfy the Q3 2023 quarterly reporting requirement for Remediation Project Number 26721, to provide results of recent site investigation, 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: Schuyler Hamilton

Title: Env. Compliance Analyst

Submit Date: \_\_\_\_\_

Email: Schuyler.Hamilton@aec-denver.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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 26721

**COA Type****Description**

0 COA	

**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**

403614351	SITE INVESTIGATION REPORT
403614352	ANALYTICAL RESULTS
403614353	ANALYTICAL RESULTS
403614354	ANALYTICAL RESULTS

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)