

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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01/21/2023

Report taken by:

Jason Kosola

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: CATAMOUNT ENERGY PARTNERS LLC	Operator No: 10464	Phone Numbers
Address: 600 17TH STREET STE 1400S		Phone: (720) 484-2346
City: DENVER	State: CO	Zip: 80202
Contact Person: Reed Fischer	Email: rfischer@catamountep.com	Mobile: (303) 981-292

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22780 Initial Form 27 Document #: 402998172

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: Plug & abandonment of orphaned wellbore

SITE INFORMATION

No Multiple Facilities

Facility Type: WELL	Facility ID:	API #: 067-09087	County Name: LA PLATA
Facility Name: BRYCE (OWP) 1-X	Latitude: 37.054009	Longitude: -107.873538	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWSW	Sec: 31	Twp: 33N	Range: 9W
Meridian: N	Sensitive Area?	Yes	

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Residential Housing

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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- ☐ E&P Waste ☐ Other E&P Waste ☒ Non-E&P Waste
☐ Produced Water ☐ Workover Fluids metal panels and existing rig anchors
☐ 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	2.2 acres	Previous soil gas surveys

INITIAL ACTION SUMMARY

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

Additional investigation will involve both soil gas sampling, domestic water well sampling (from the nearby Fire Station, Fellman (landowner) water well & "South" water well adjoining the landowner's property) plus water sampling from the wellbore if water is encountered during P&A operations. There will be both a pre & post P&A soil gas survey. The surveys will mimic the last soil gas sampling survey conducted by Cottonwood Consulting on June 16, 2016. The pre P&A soil gas sampling will occur after a shut-in period and prior to a bradenhead test which will precede the P&A wellbore operations. Upon completion of the P&A operations there will be the post P&A soil gas sampling as described above. The existing rig anchors will be cut off below ground level and soil sample(s) will be collected next to the cut-off casing before backfilling over the landowner requested below ground dry-hole plate. Catamount will then reseed disturbed ground with a landowner approved seed mix.

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):

At least one discrete sample at wellhead

Proposed Groundwater Sampling

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

3 adjoining domestic water wells will be sampled (Fire Station, Middle well (landowner's well) and South well). Fire station well and South well are currently in COGCC's annual testing program.

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 1
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 10

Groundwater

Number of groundwater samples collected 1
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) 15
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 1

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.

NA / ND

NA Highest concentration of TPH (mg/kg)
Highest concentration of SAR
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 2

Highest concentration of Benzene (µg/l)
NA Highest concentration of Toluene (µg/l)
-- Highest concentration of Ethylbenzene (µg/l) 0.137
-- Highest concentration of Xylene (µg/l) 0.22
-- Highest concentration of Methane (mg/l) 9200

OTHER INVESTIGATION INFORMATION

☐ Were impacts to adjacent property or offsite impacts identified?

☒ Were background samples collected as part of this site investigation?

Background sample was obtained upgradient from the sample taken at the wellhead.

☐ 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?

Annual domestic water well testing is being conducted by the COGCC for the Fire Station water well and the "South" well

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.

Excavate and haul to commercial disposal

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.

If soil is determined to be contaminated, the contaminated soil will be excavated and replaced with clean soil and the contaminated soil will be hauled to an approved facility

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

 Bioremediation (or enhanced bioremediation)

 Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

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.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☐ Quarterly☐ Semi-Annually☐ Annually☐ Other

☒ Request Alternative Reporting Schedule:

☐ Semi-Annually☐ Annually☒ Other

Operator plugged orphan well for the COGCC and was instructed to obtain soil gas, soil & water samples. These samples were obtained and results attached. Operator's obligations ended 12/31/22. No further reporting.

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: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes _____

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? Yes _____

Does the previous reply indicate consideration of background concentrations? Yes _____

Does Groundwater meet Table 915-1 standards? No

Is additional groundwater monitoring to be conducted? Yes

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.

Following below ground cut-off of wellhead and existing rig anchors, the excavations will be backfilled to grade and reseeded with landowner approved seed mix anticipated to be Southern Ute Rangeland Seed Mix #2

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. 04/05/2022

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). _____

Proposed site investigation commencement. 04/26/2022

Proposed completion of site investigation. 04/29/2022

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

Operator plugged this orphan well for the COGCC. The wellbore has been fully plugged and the wellhead cut off, a dryhole plate welded on the stub and buried 4' below ground level. Part of the plugging directive was to obtain pre & post plugging soil gas sampling, post plugging soil sampling and water sampling from the wellbore prior to pumping cement. All requested sampling was conducted. There was no gas detected in the soil gas sampling. Only the pH level in the soil sample exceeded Table 915 when considering the background sample results and the wellbore fluid sample was nasty from previous and much earlier attempts at abandonment but the COGCC is and has been conducting annual water well testing from the two adjacent water wells to monitor this situation. There is no grading nor reseeding required. Catamount's abandonment obligations ended 12/31/22 pursuant with to prior OWP plugging agreement with COGCC.

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

Signed: Reed Fischer

Title: Engineering Advisor

Submit Date: 01/21/2023

Email: rfischer@catamountep.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: Jason Kosola

Date: 01/03/2024

Remediation Project Number: 22780

COA Type

Description

	<p>NO FURTHER ACTION</p> <p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>
1 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

403298007	FORM 27-SUPPLEMENTAL-SUBMITTED
403298008	MONITORING REPORT
403298009	ANALYTICAL RESULTS
403298010	ANALYTICAL RESULTS
403298011	SOIL SAMPLE LOCATION MAP
403298013	PHOTO DOCUMENTATION
403298017	ANALYTICAL RESULTS
403298018	ANALYTICAL RESULTS

Total Attach: 8 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)