

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:
403709318
Receive Date:
03/06/2024

Report taken by:
Steven Arauza

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 ECMC 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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 902-3598
City: DENVER State: CO Zip: 80202		Mobile: (970) 902-3598
Contact Person: Andy Verbonitz	Email: averbonitz@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34380 Initial Form 27 Document #: 403709318

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: GAS COMPRESSOR STATION	Facility ID: 419752	API #: _____	County Name: GARFIELD
Facility Name: BULL FORK COMPRESSOR STATION	Latitude: 39.695594	Longitude: -108.283333	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 16	Twp: 4S	Range: 97W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE	Facility ID: 485683	API #: _____	County Name: RIO BLANCO
Facility Name: Bullfork Tank Bullplug Freeze	Latitude: 39.696385	Longitude: -108.282971	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSE	Sec: 16	Twp: 4S	Range: 97W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM _____

Most Sensitive Adjacent Land Use East Willow
Creek, located
approximately
200' west of
location _____

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

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
No	GROUNDWATER	NA	Not encountered
UNDETERMINED	SOILS	NA	Visual Inspection
No	SURFACE WATER	NA	Not currently present/frozen

INITIAL ACTION SUMMARY

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

While checking tanks on Cygnet the operator notice a drop in tank level at Bullfork. He proceeded to location to find a bull plug in the tank had frozen an split, he contacted a truck to come pull the remaining contents of the tank. The operator isolated the tank and ran the trend again. He found the tank had dropped in 6" in tank volume. Resulting in 10 BBLs of fluid leaking into the secondary containment. The truck recovered as much free product as he could but most of the water had frozen inside the secondary containment. The operator replaced the broken bull plug. He proceed to inspect the containment to the best of his ability and determined the containment had sound integrity.

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):

Upon access and spring thaw, the containment will be inspected again. When temperatures and road conditions are favorable a hydro-vacuum truck equipped with a hotsy pressure washer will be deployed at the site to wash and recover any remaining impacts left inside the lined containment. If containment is found to be compromised soil samples will be collected from suspected areas of impact and will be submitted for laboratory analysis of Table 915-1 constituents.

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):

If confirmation or assessment soil samples are deemed necessary based on visual inspection, background samples will also be collected.

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
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 _____

_____ Highest concentration of Benzene (µg/l) _____
_____ Highest concentration of Toluene (µg/l) _____
_____ Highest concentration of Ethylbenzene (µg/l) _____
_____ Highest concentration of Xylene (µg/l) _____
_____ 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) 0 Volume of liquid waste (barrels) 6

Is further site investigation required?

Upon access and spring thaw, the containment will be inspected again. When temperatures and road conditions are favorable a hydro-vacuum truck equipped with a hotsy pressure washer will be deployed at the site to wash and recover any remaining impacts left inside the lined containment. If containment is found to be compromised soil samples will be collected from suspected areas of impact and will be submitted for laboratory analysis of Table 915-1 constituents.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Approximately 6 bbls of release liquid was vacuumed up from the containment prior to it freezing.

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.

Upon access and spring thaw, the containment will be inspected again. When temperatures and road conditions are favorable a hydro-vacuum truck equipped with a hotsy pressure washer will be deployed at the site to wash and recover any remaining impacts left inside the lined containment. If containment is found to be compromised soil samples will be collected from suspected areas of impact and will be submitted for laboratory analysis of Table 915-1 constituents.

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
_____ Natural Attenuation
_____ Other _____

_____ 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.

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 _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

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

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC 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.

If intrusive assessment or remediation is required, any disturbed areas will be reclaimed in accordance with 1000 series rules if offsite, or returned to active pad working surface if onsite.

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. 12/10/2023

Actual Spill or Release date, or date of discovery. 12/10/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/10/2023

Proposed site investigation commencement. 04/01/2024

Proposed completion of site investigation. 05/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/01/2024

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

Regarding COA 1 received on Form 19 Initial Report 403620883, the regulatory team is in process of submitting a Change of Operator Form 9 to update the Location ID (#316065) from the old operator, Encana, to the new operator, Caerus. Additional complications are being met as Encana is no longer an operator, and the new operator, Ovintiv, who is the purchaser of Encana, does not operate in Colorado. Caerus has been in communication with Doug Andrews regarding these matters, and that correspondence is also attached.

Regarding COA received on Form 19 Supplemental Report 403632316, the photo documentation and correspondence related to delay of COA 1 on Initial Form 19 have been attached to this form, and will also be attached to the Form 19 closure report once the remediation number is established.

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

Signed: Andy Verbonitz

Title: EHS Specialist

Submit Date: 03/06/2024

Email: averbonitz@caerusoilandgas.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Steven Arauza

Date: 03/13/2024

Remediation Project Number: 34380

COA Type

Description

	Submit Supplemental eForm 19 to request closure of Spill/Release ID #485683. Supplemental report shall comply with outstanding COAs, indicate that work is proceeding under an approved eForm 27 and shall reference the Remediation Project number assigned upon approval of this report.
	If secondary containment is found to be compromised, the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater, per Rule 913.b.(2). The Operator shall analyze samples for the complete Table 915-1 list and shall compare analytical results for site investigation samples to both the Table 915-1 Residential Soil Screening Level Concentrations and the Protection of Groundwater Soil Screening Level Concentrations. Submit an assessment of potential pathways to groundwater via a Supplemental Form 27.
2 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

403709318	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403709983	CORRESPONDENCE
403709988	PHOTO DOCUMENTATION
403710049	CORRESPONDENCE
403717923	FORM 27-INITIAL-SUBMITTED

Total Attach: 5 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)