

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:

403680127

Receive Date:

03/18/2024

Report taken by:

Steven Arauza

## 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 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 Phone: (970) 902-3598 Mobile: (970) 902-3598
Address: 1001 17TH STREET #1600		
City: DENVER State: CO Zip: 80202		
Contact Person: Andrew Verbonitz	Email: averbonitz@caerusoilandgas.com	

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 33297 Initial Form 27 Document #: 403580802

## 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: SPILL OR RELEASE	Facility ID: 485082	API #: _____	County Name: GARFIELD
Facility Name: F23 596 Separators	Latitude: 39.602105	Longitude: -108.140694	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 23	Twp: 5S	Range: 96W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications GM Most Sensitive Adjacent Land Use Non-cropland

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

West Fork of Parachute Creek is located approximately 280 feet southeast.

## 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	Soil samples and 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.

On September 10, 2023, an unknown volume of produced water and condensate was released when a dumpline failed. The release was reported via Energy & Carbon Management Commission (ECMC) Form 19 Document 403525124 to open Spill/Release Point ID 485082. Form 27 Document 403580802 was later submitted to open Remediation Project 33297.

### 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 ):

Soil samples will be collected as needed to delineate the horizontal and vertical extent of soil impacts. Soil samples will be submitted for the approved reduced analyte list of total petroleum hydrocarbons (TPH), xylenes, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene sodium adsorption ratio (SAR), and hexavalent chromium. See the Report of Work Completed (ROWC) associated with Document 403580802 for details.

#### Proposed Groundwater Sampling

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

Groundwater is not anticipated to be encountered. Caerus will attempt to collect a sample for characterization if groundwater is encountered during site investigation activities.

#### 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 1Number of soil samples exceeding 915-1 1Was the areal and vertical extent of soil contamination delineated? NoApproximate areal extent (square feet) 100**Groundwater**Number of groundwater samples collected 0Was extent of groundwater contaminated delineated? YesDepth to groundwater (below ground surface, in feet) Number of groundwater monitoring wells installed Number of groundwater samples exceeding 915-1 **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**-- Highest concentration of TPH (mg/kg) 3831-- Highest concentration of SAR 15.5BTEX > 915-1 YesVertical Extent > 915-1 (in feet) 6 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) **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?

See Proposed Sampling Plan section and the ROWC associated with Document 403580802.

**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.

Caerus is in the process of determining the extent of contamination associated with the the release. Once the extent of impacts is determined, Caerus will provide a remediation strategy for ECMC review and approval on a Supplemental Form 27.

**REMEDIAL 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.

On September 18, 2023, initial sampling was performed to characterize the point of release (POR). One soil sample was collected from directly beneath the POR at 6 feet below ground surface (bgs). Analytical results of the POR characterization sample indicate compliance with ECMC Table 915-1 Residential Soil Screening Levels (RSSLs) except for TPH, xylenes, 1,3,5-trimethylbenzene, SAR, and arsenic. Background data collected in support of a separate investigation at the F23 wellpad (ECMC Location ID 335667) indicates elevated levels of arsenic in native soil. Caerus requests an alternative allowable limit for arsenic of 22.6 milligrams per kilogram (mg/kg) in accordance with ECMC Table 915-1 Footnote 1.

On December 21, 2023, the ECMC approved a reduced analyzed list of TPH, xylenes, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, SAR, and hexavalent chromium based on analytical results of site investigation via Form 27 Document 403580802.

**Soil Remediation Summary**☐ In Situ☐ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )  
\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

Groundwater has not been encountered during site investigation activities to date. If groundwater is encountered during future site investigation activities, Caerus will attempt to collect a sample for characterization.

## 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 Q1 2024 Status 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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, Caerus has general liability insurance in the amount of \$1M, and Caerus has umbrella insurance, which sits over the general liability insurance in the amount of \$75M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$76M.

Operator anticipates the remaining cost for this project to be: \$ 50000

### 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: \_\_\_\_\_

## 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 ECMC 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.

Any disturbance will be returned to the active working surface of the well pad for continued operation. When the site is decommissioned at a later date, it will be reclaimed in accordance with 1000 Series regulations.

Is the described reclamation complete? No

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. 09/10/2023

Actual Spill or Release date, or date of discovery. 09/10/2023

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/18/2023

Proposed site investigation commencement. 09/18/2023

Proposed completion of site investigation. \_\_\_\_\_

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/18/2023

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 provide a 1st Quarter 2024 Status Update and to request a semi-annual reporting schedule for Remediation Project 33297. Continued site investigation will resume once a remedial strategy is established. See the ROWC associated with Document 403580802 for site investigation details to date.

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

Signed: Andrew Verbonitz

Title: EHS Rem. Specialist

Submit Date: 03/18/2024

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: 03/29/2024

Remediation Project Number: 33297

### 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

403680127	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403736014	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

## General Comments

### User Group

### Comment

### Comment Date

Environmental	Comply with outstanding COAs.	03/29/2024
Environmental	Based on the information provided, the Operator's request for a semi-annual reporting schedule is conditionally approved.	03/29/2024

Total: 2 comment(s)