

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 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: TAPROOT ROCKIES MIDSTREAM LLC Operator No: 10718 Phone Numbers  
Address: 555 17TH STREET SUITE 800 Phone: (701) 509-2063  
City: DENVER State: CO Zip: 80202 Mobile: ( )  
Contact Person: Dave Brazeal Email: dbrazeal@taprootep.com

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21046 Initial Form 27 Document #: 402863200

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: 480563 API #: County Name: WELD  
Facility Name: Hale East PW Leak Latitude: 40.651669 Longitude: -104.085683  
\*\* correct Lat/Long if needed: Latitude: 40.650720 Longitude: -104.085289  
QtrQtr: NWNW Sec: 22 Twp: 8N Range: 60W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use agricultural  
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? No  
Is groundwater less than 20 feet below ground surface? No

**Other Potential Receptors within 1/4 mile**

None

**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	<500 sq. ft.	soil analytical results

**INITIAL ACTION SUMMARY**

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

The leak was discovered NE of the Bison Hale well pad on 8/18/21. It was determined to be from the Taproot Produced Water Transfer system, just east of a previous leak. The system was shut down, isolated, and cleanup and excavation began. The spill occurred on land owned by Taproot. The 4" Thermoflex 750 psi pipeline had buckled and the thin spot created by the buckling failed at about 416 psig (well below the 750 psig rating). The piping was in service since January 2021. The Thermoflex piping has now been replaced with Flexsteel along the whole extent of this segment.

**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 soil samples were collected as part of the reclamation planning and Site Reclamation Plan has been developed. Delineation of soil has been completed at the site.

**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 ):

A reclamation plan was developed with the help of SWCA Consultants, and in accordance with ECOM guidance Rule 915b and the reclamation plan is provided with this form, to receive NFA determination.

**SITE INVESTIGATION REPORT**

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 39  
Number of soil samples exceeding 915-1 24  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 1000

### NA / ND

-- Highest concentration of TPH (mg/kg) 85  
-- Highest concentration of SAR 10.5  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 5

### Groundwater

Number of groundwater samples collected 0  
Was extent of groundwater contaminated delineated? No  
Depth to groundwater (below ground surface, in feet) 110  
Number of groundwater monitoring wells installed 0  
Number of groundwater samples exceeding 915-1 0

NA Highest concentration of Benzene (µg/l) \_\_\_\_\_  
NA Highest concentration of Toluene (µg/l) \_\_\_\_\_  
NA Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
NA Highest concentration of Xylene (µg/l) \_\_\_\_\_  
NA Highest concentration of Methane (mg/l) \_\_\_\_\_

### Surface Water

0 Number of surface water samples collected  
0 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?

Three background samples were collected from the Hale release along the same segment of pipe. The soil sampling results are included in Table 1. Sample locations are illustrated in Figure 1. The background samples were collected from nearby unaffected soil, and indicated elevated pH, and arsenic.

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.

Primary excavation occurred in 2021, immediately after the spill was found. Additional excavation occurred in 2023 when Taproot replaced the pipeline with Flexsteel pipe. Limited remaining exceedances of Table 915 reclamation parameters are to be left in place in accordance with rule 915b, development and implementation of a Comprehensive Reclamation Plan.

### 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.

A final reclamation plan was developed that satisfies ECMC 900 series rules, allowing for limited exceedances of Table 915 to be left in place below the primary root zone. Closure and NFA determination are requested following collection of clean confirmation samples on 5/18/2022, and 2/2/2024. Delineation of reclamation parameters exceeding Table 915 within the root zone has been completed.

### Soil Remediation Summary

In Situ

Ex Situ

No Bioremediation ( or enhanced bioremediation ) Yes Excavate and offsite disposal

No Chemical oxidation  
 No Air sparge / Soil vapor extraction  
 No Natural Attenuation  
 Yes Other Soil will be left in place and has been addressed by the attached reclamation plan.

If Yes: Estimated Volume (Cubic Yards) 300  
Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_  
 Excavate and onsite remediation  
 Land Treatment  
 Bioremediation (or enhanced bioremediation)  
 Chemical oxidation  
 Other \_\_\_\_\_

**Groundwater Remediation Summary**

No Bioremediation ( or enhanced bioremediation )  
 No Chemical oxidation  
 No Air sparge / Soil vapor extraction  
 No Natural Attenuation  
 No 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 Reclamation Plan \_\_\_\_\_

## 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.

The anticipated cost for the remaining remediation of this site is expected to be less than \$10,000. Taproot has \$2,000,000 of General Liability Insurance, and \$5,000,000 of Excess Liability Insurance. Taproot also has sufficient cash flow to cover this remediation.

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

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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? 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? Yes

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.

A reclamation plan has been developed to meet the requirements of ECMC guidance Rule 915b. The reclamation plan is attached.

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? Yes

If YES, does the seed mix comply with local soil conservation district recommendations? Yes

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

### **SITE RECLAMATION DATES**

Proposed date of commencement of Reclamation. 04/01/2023

Proposed date of completion of Reclamation. 05/31/2023

## 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. 08/19/2021

Actual Spill or Release date, or date of discovery. 08/18/2021

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 08/19/2021

Proposed site investigation commencement. 04/04/2022

Proposed completion of site investigation. 02/02/2024

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 04/04/2022

Proposed date of completion of Remediation. 03/29/2024

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**

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

Signed: Dale Hunt \_\_\_\_\_

Title: VP of Engineering \_\_\_\_\_

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

Email: DHunt@taprootep.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: \_\_\_\_\_

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

Remediation Project Number: 21046 \_\_\_\_\_

**COA Type****Description**

0 COA	

**ATTACHMENT 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**

403725316	SOIL SAMPLE LOCATION MAP
403725317	ANALYTICAL RESULTS
403725318	OTHER
403725319	ANALYTICAL RESULTS
403725321	PHOTO DOCUMENTATION
403725335	RECLAMATION PLAN
403758315	SITE INVESTIGATION REPORT

Total Attach: 7 Files

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

Environmental	Based on the information presented, it appears the elevated pH samples appears to be de minimis in quantity or within the range of background pH; therefore, elevated pH may not be associated with E&P activities.	04/17/2024
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Total: 1 comment(s)