

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403743523  
Receive Date:  
04/04/2024

Report taken by:  
John Heil

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: <u>TEP ROCKY MOUNTAIN LLC</u>	Operator No: <u>96850</u>	Phone Numbers Phone: <u>(970) 263-2760</u> Mobile: <u>(970) 623-4875</u>
Address: <u>1058 COUNTY ROAD 215</u>		
City: <u>PARACHUTE</u>	State: <u>CO</u>	Zip: <u>81635</u>
Contact Person: <u>Michael Gardner</u>	Email: <u>mgardner@terraep.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35114 Initial Form 27 Document #: 403743523

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: Historical Pit Closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>111464</u>	API #: _____	County Name: <u>GARFIELD</u>
Facility Name: <u>2-W-29</u>	Latitude: <u>39.500689</u>	Longitude: <u>-108.014624</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>29</u>	Twps: <u>6S</u>	Range: <u>95W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications OH Most Sensitive Adjacent Land Use Open Rnage/Grazing  
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

None

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- X 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
X Drill Cuttings
Spent Filters
Pit Bottoms
Other (as described by EPA)

DESCRIPTION OF IMPACT

Table with 4 columns: Impacted?, Impacted Media, Extent of Impact, How Determined. Row 1: No, SOILS, N/A, confirmation soil sampling

INITIAL ACTION SUMMARY

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

Historical pit closure from 2011

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 ):

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 ):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil NA / ND

Number of soil samples collected 1 -- Highest concentration of TPH (mg/kg) 11  
 Number of soil samples exceeding 915-1 0 -- Highest concentration of SAR 40  
 Was the areal and vertical extent of soil contamination delineated? Yes BTEX > 915-1 No  
 Approximate areal extent (square feet) 0 Vertical Extent > 915-1 (in feet) 0

**Groundwater**

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l) \_\_\_\_\_  
 Was extent of groundwater contaminated delineated? No Highest concentration of Toluene (µg/l) \_\_\_\_\_  
 Depth to groundwater (below ground surface, in feet) 200 Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
 Number of groundwater monitoring wells installed 0 Highest concentration of Xylene (µg/l) \_\_\_\_\_  
 Number of groundwater samples exceeding 915-1 0 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?  
 Background samples were collected in 2011 (Refer to Doc# 2216749)  
 \_\_\_\_\_
- 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**

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.  
 \_\_\_\_\_  
 N/A - Pit closure documentation submitted and approved via Form 4 on 10/19/2011 (Doc# 2216749)

**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.  
 \_\_\_\_\_  
 N/A - Pit closure documentation submitted and approved via Form 4 on 10/19/2011 (Doc# 2216749)

**Soil Remediation Summary**

- |   |  |
|---|--|
| <input type="checkbox"/> <b>In Situ</b>             | <input type="checkbox"/> <b>Ex Situ</b>                              |
| _____ Bioremediation ( or enhanced bioremediation ) | _____ Excavate and offsite disposal                                  |
| _____ Chemical oxidation                            | _____ If Yes: Estimated Volume (Cubic Yards) _____                   |
| _____ Air sparge / Soil vapor extraction            | _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____ |
| _____ Natural Attenuation                           | _____ Excavate and onsite remediation                                |

Other \_\_\_\_\_

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.

None

# 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.

Please see TEP's current Financial Assurance Plan (see attached Form 3 Doc #403378610) that was previously approved by ECMC, and which was effective on April 26, 2023. This Financial Assurance Plan has been provided to comply with the Financial Assurance requirements outlined in the ECMC Section 700 rules and provides adequate information to fully address anticipated costs pertaining to the plugging, abandonment, and remediation of any TEP well / facility. Per ECMC's approval of this Financial Assurance Plan (Form 3), TEP's existing financial assurance levels are deemed sufficient to protect against property damage, bodily injury to personnel and contractors, or any potential releases of pollution to the environment that may threaten public health, safety, or welfare

Operator anticipates the remaining cost for this project to be: \$ 0 \_\_\_\_\_

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



**OPERATOR COMMENT**

This Form 27 is being submitted as requested within the COA's of the Initial Form 27 (Doc# 403471564) pertaining to the DOE 2-W-29 P&A of UIC disposal well (Facility ID 210830 / API 05-045-06588) regarding the closure of a historical pit related to the UIC well.

Aerial photographs of the location from 2011 show a pit constructed on the north side of the pad, which had been reclaimed in the next available aerial photograph in 2014.

A database review indicates a Form 4 (Doc# 2216749) was submitted under the previous operator, Williams Production RMT, on 10/19/2011 and approved by the COGCC (now known as ECMC). The Form 4 provides analytical data for samples collected from the cuttings placed within the pit, as well as background data for arsenic comparison. Request to proceed with closure and reclamation of the pit was approved on 10/28/2011.

Refer to the attachments section of this Form 27 for aerial imagery and a copy of the approved Form 4 containing the confirmation data and sample map that was submitted on 10/19/2011.

TEP is requesting the pit (Facility ID 111464) be formally closed and the status updated on the ECMD database.

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

Signed: Kris Rowe

Title: TEP Environmental

Submit Date: 04/04/2024

Email: Krowe@terraep.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: John Heil

Date: 04/24/2024

Remediation Project Number: 35114

**COA Type****Description**

<u>COA Type</u>	<u>Description</u>
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.

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
403743523	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403743549	AERIAL IMAGE
403743554	AERIAL IMAGE
403743557	AERIAL IMAGE
403743562	SITE INVESTIGATION REPORT
403768577	FORM 27-INITIAL-SUBMITTED

Total Attach: 6 Files

**General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Pit Facility ID 111464 will be closed with the submittal of the Form 27 Supplemental requesting closure of this remediation project.	04/24/2024

Total: 1 comment(s)