

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

403795515

Receive Date:

05/23/2024

Report taken by:

ALEX FISCHER

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: WESTERN OPERATING COMPANY	Operator No: 95620	Phone Numbers
Address: 1165 DELAWARE STREET #200		Phone: (303) 893-2438
City: DENVER	State: CO	Zip: 80204
Contact Person: Steve James	Email: steve@westernoperating.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27155 Initial Form 27 Document #: 403273080

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: PIT	Facility ID: 256304	API #: _____	County Name: LOGAN
Facility Name: PROPST 1-A	Latitude: 40.892798	Longitude: -103.264685	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSW	Sec: 26	Twp: 11N	Range: 53W
Meridian: 6	Sensitive Area? Yes		

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Range

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 identified. The nearest water wells permitted with the Colorado Division of Water Resources (DWR) are located approximately 0.5 miles south-southwest of the site (DWR Permit # 120292) and 0.7 miles northwest of the site (DWR Permit Receipt # 26047). The DWR well constructions logs report groundwater depths of 70 feet below ground surface (bgs) for DWR Permit # 120292 (constructed in 1981) and 80 feet bgs for DWR Permit # 26047 (constructed in 1965).

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
UNDETERMINED	SOILS	Unknown	Pending assessment

INITIAL ACTION SUMMARY

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

Western Operating will excavate the unlined Propst 1A pit. Downgradient salt impacts from the pit were identified by the ECMC and are being addressed in a separate Form 27 (Remediation Number 27153). Prior to removing the pit, any produced water remaining in the pit will be removed and disposed of in the Propst 1 Disposal Well, and any oily waste present will be disposed of in accordance with Rule 905.e. Any liquid or solid waste that may be removed from the site will be transported for disposal at the Pawnee Waste facility in Grover, Colorado.

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 following the excavation of the pit to assess any remaining impacts associated with the excavated pit. Based on the area of the pit footprint, it is estimated that up to 20 soil samples will be collected from the based of the pit following the excavation. All soil samples will be analyzed for complete ECMC Table 915-1 list of analytes. Additional soil samples will be collected based on the post excavation soil sample results.

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):

Samples will be collected from water within the pit for full Table 437-1, Table 915-1, and Table 615.e.(2) analysis (excluding the dissolved gasses and bacteria analysis). Water will be sampled for Rule 909.j.(1). Analytical results will be submitted in a supplemental Form 27 submittal.

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 0

Number of soil samples exceeding 915-1 0

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 14000

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

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1

Vertical Extent > 915-1 (in feet)

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)

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? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The produced water in the pit will be removed and disposed of at the Propst 1 disposal well. Any Water and any oily soil that taken offsite will be disposed of at an approved offsite disposal facility in accordance with ECOM Rule 905. Soils excavated during the pit removal will be characterized and disposed of at an approved offsite disposal facility. If impacts are identified below the pit, additional assessment, and remedial measures will be evaluated and presented in a Supplemental Form 27 submittal.

REMEDIAL ACTION 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.

Following excavation of the pit, soil samples will be collected to determine if additional excavation, assessment, or other remedial actions will be needed to address impacts associated with the pit.

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 ECMC 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.

Western Operating has \$7,000,000 in liability insurance and is currently adequately bonded.

Operator anticipates the remaining cost for this project to be: \$ 300000

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.

Following remediation, the pit will be reclaimed in accordance with COGCC 1000 series rules.

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/01/2023

Proposed site investigation commencement. 06/01/2023

Proposed completion of site investigation. 07/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/01/2024

Proposed date of completion of Remediation. 10/31/2024

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

Denied 05/30/2024

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

Signed: Steve James

Title: President

Submit Date: 05/23/2024

Email: steve@westernoperating.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: 27155

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**

403795515	FORM 27 DENIED
403809341	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>ECMC has denied this Form 27 for the following reasons and requests the following information/documentation before resubmittal:</p> <ul style="list-style-type: none"> - As stated in Doc# 403273080, Additional soil samples should be collected where effluent is discharged into the pit. A deep soil boring shall be advanced and samples collected at the lowest portion of the pit. <p>Operator shall provide a Soil Sample Location Map that illustrates the location of each proposed soil sample.</p> <ul style="list-style-type: none"> - As stated in Doc# 403273080, It is stated that, "Any liquid or solid waste removed from the site will be transported offsite for disposal at the Pawnee Waste facility in Grover, Colorado." Provide verification of Pawnee Waste facility accepting liquid waste. Provide an explanation in why the liquid waste would not be disposed via UIC Disposal ID: 159442 (05-075-09204) Propst 1. -As stated in Doc# 403273080, Operator shall comply with 900 Series Rules. Determine vertical and horizontal extent of spill to establish points of compliance and conduct soil analysis with discrete sampling and photo documentation to provide in future Supplemental Form 27s. -As stated in Doc# 403273080, Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit field notes of all field activities reported during a Quarterly Update. -Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27. The "Date of Surface Owner notification/consultation, if required." information is missing. - Operator shall populate the Site Investigation Report within the next submittal. - ECMC does not approve of the remediation plan: "Soil samples will be collected following the excavation of the pit to assess any remaining impacts associated with the excavated pit. Based on the area of the pit footprint, it is estimated that up to 20 soil samples will be collected from the based of the pit following the excavation." <p>Operator shall fully characterize the vertical and lateral extent of potentially impacted area prior to remediation. The existing remediation plan (Doc #403795515) does not include the proposed soil sample location areas.</p>	05/30/2024

Total: 1 comment(s)