

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403793239
Receive Date:
05/21/2024
Report taken by:
Krystal Heibel

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 ECOM 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>CENTRAL OPERATING INC</u>	Operator No: <u>14855</u>	Phone Numbers Phone: <u>(303) 8949576</u> Mobile: <u>(303) 8940898</u>
Address: <u>1600 BROADWAY STE 1050</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Cullin Johnson</u>	Email: <u>coidenverproduction@gmail.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35820 Initial Form 27 Document #: 403793239

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: <u>LOCATION</u>	Facility ID: <u>317067</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>STATE-63S51W 36SWNW</u>	Latitude: <u>39.751720</u>	Longitude: <u>-103.045272</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>36</u>	Twp: <u>3S</u>	Range: <u>51W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

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

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? Yes

Other Potential Receptors within 1/4 mile

Per NRCS USDA Web Soil Survey: Planter loam, 0 to 3 percent slopes.
Moderately low ability to transmit water (Ksat) with depth to water table at more than 80 inches.

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	18"	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.

The treater lost gas pressure and oil tanks leaked 10 bbls oil. The wells were shut in and all valves on treater were shut in. All fluid was contained inside the berms and then recovered with a vacuum truck. Contaminated dirt was immediately removed and stockpiled on location.

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):

3 In-Situ soil samples and 2 background samples, all at 18" depth, have been taken as part of this investigation. All samples were grab samples, analyzed for Full Table 915-1 suite analytes. Sample locations and lat/longs have been provided in the previously submitted Form 19S (403773409). Additional sampling plans and proposed sampling points have been attached in this Remediation update.

Proposed Groundwater Sampling

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

[Empty box for groundwater sampling details]

Proposed Surface Water Sampling

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

[Empty box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Continued investigation of potential impacts at in-situ points 2 & 3 will occur. Initial sampling indicated levels of SAR and pH in exceedance of Table 915-1 and background levels. Continued delineation will be performed. At Sample point 1, pH levels were above Table 915-1 standards, but within background soil sampling levels. ECMC agreed to the reduced analyte list of sample for only Table 915-1 soil solubility for reclamation analytes.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 5

Number of soil samples exceeding 915-1 3

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 75

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 11.03
9

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 1

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?

2 background samples have been collected as part of the investigation. Both samples were collected at a depth of 18".

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 164

Volume of liquid waste (barrels) 0

Is further site investigation required?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soil was excavated and cleaned up on same day as spill was discovered. Contaminated soil was commingled with excavated soil from onsite skim pit, which was mid-closure. Contaminated soil was hauled to CSI Landfill. Soil sampling will continue to be done until results prove no exceedances of Table 915 thresholds.

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.

All excavated soil will be removed from location and disposed of at a certified disposal facility.

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

Name of Licensed Disposal Facility or ECMC Facility ID # _____

____ Natural Attenuation
____ Other _____

____ 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.

Maggie has financial assurance bonding per Rule 702 and carries General Liability Insurance compliance with Rule 705. No claim is anticipated for this cleanup effort. Project is approximately 30% complete.

Operator anticipates the remaining cost for this project to be: \$ 1000 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Contaminated soil was combined with soil from onsite skim pit closure, and hauled to CSI Landfill.

Volume of E&P Waste (solid) in cubic yards _____ 164

E&P waste (solid) description hydrocarbon bearing soil

ECMC Disposal Facility ID #, if applicable: 983767674

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____ 0

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.

Reclamation Plan to be determined after the extent of impact is confirmed. The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules or per surface owner direction.

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. _____

Actual Spill or Release date, or date of discovery. 03/12/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/12/2018

Proposed site investigation commencement. _____

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/01/2024

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

Disposal manifests are attached to this report. Manifests indicate that 800 cubic yards of waste were removed from the location. This volume was the commingled volume of derived waste from the onsite skim pit closure, and the waste from this spill. When the skim pit was backfilled, only 636 cubic yards of clean backfill were brought in. Therefore, records indicate that the difference, 164 cubic yards of contaminated soil would have been derived from the tank battery spill at the State 1 & 3 on March 12, 2018.

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

Signed: Amber Barnett

Title: Environmental Compliance

Submit Date: 05/21/2024

Email: abarnett@ardorenvironmental.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: Krystal Heibel

Date: 06/14/2024

Remediation Project Number: 35820

COA Type**Description**

	Operator shall populate the Soil Remediation Summary under the Remedial Action Plan tab, within the next submittal.
	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.
2 COAs	

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**

403793239	FORM 27-INITIAL-SUBMITTED
403793338	SOIL SAMPLE LOCATION MAP
403793343	SOIL SAMPLE LOCATION MAP
403793344	ANALYTICAL RESULTS
403793345	ANALYTICAL RESULTS
403798408	DISPOSAL MANIFESTS
403798411	DISPOSAL MANIFESTS
403798415	DISPOSAL MANIFESTS

Total Attach: 8 Files

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

Environmental	Based on the Operator's assessment of background conditions at the subject location, arsenic results for confirmation soil samples appear to be representative of background as opposed to E&P activities. Therefore, the Operator's demonstration of background will be accepted as an alternative to the default standard in ECMC's Table 915-1.	06/14/2024
Environmental	Due to the presence of impacted soil in contact with groundwater Operator shall comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.	06/14/2024
Environmental	Per Doc# 403773409, ECMC agrees to the reduced analyte list of sampling for only Table 915-1 Soil Suitability for Reclamation analytes.	06/11/2024

Total: 3 comment(s)