

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

403859933

Receive Date:

07/22/2024

Report taken by:

Jason Kosola

## 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: HARVEST FOUR CORNERS LLC	Operator No: 10345	Phone Numbers
Address: 1111 TRAVIS STREET		Phone: (505) 6324625
City: HOUSTON	State: TX	Zip: 77002
Contact Person: Monica Smith	Email: msmith@harvestmidstream.com	Mobile: ( )

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 36370 Initial Form 27 Document #: 403859933

## 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: 486540	API #: _____	County Name: LA PLATA
Facility Name: Closed Drain System	Latitude: 37.144580	Longitude: -107.786605	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWSW	Sec: 36	Twp: 34N	Range: 9W
Meridian: M	Sensitive Area? No		

## SITE CONDITIONS

General soil type - USCS Classifications MH Most Sensitive Adjacent Land Use residential

Is domestic water well within 1/4 mile? Yes 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**

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# 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)      Dehy and Mole Sieve Condensed vapor

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	10' x10'	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 release was in the middle of large processing plant with nearby sidewalks and piping. Harvest personnel taped off the area, installed Lock out / Tag out on the closed drain system, then excavated area around leaking closed drainpipe by hand. A pipe clamp was installed to stop the release, and the area was continually monitored for LEL. Liquid in hole was pumped out and immediate area was excavated by hand. The pipe was repaired using a carbon fiber pipe repair wrap. The repair was designed and executed to ASME PCC-2 standard. It is considered a permanent repair per code. The specifications for the repair are attached. A contributing factor to the pipe stress causing the incident was a welded tee perpendicular to the main header anchored by concrete. The tee on the affected line is capped, and no longer used. We plan to cut out the tee and the repaired section of piping and replace them with new welded pipe. This work will be scheduled during a scheduled plant outage in Spring 2025.

## 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 ):

Initial soil sampling from the walls and floors were collected in addition to two background soil samples. After additional hand excavation one grab sample will be collected from each sidewall and the floor. Based on the initial sample results, Harvest is requesting a reduced analyte list for closure sampling after additional excavation is completed. See attached table for analytical results.

Harvest is requesting the required analyte list is reduced to the following:

- TPH
- 1-Methylnaphthalene
- 2-Methylnaphthalene
- Barium
- Lead
- Electrical Conductivity
- Sodium Adsorption Ratio
- pH

Arsenic and Selenium are omitted due to concentrations being within range of background levels.

### 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

Number of soil samples collected 5

Number of soil samples exceeding 915-1 4

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

Approximate areal extent (square feet) 100

### 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) 2000

-- Highest concentration of SAR 29

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 8

ND Highest concentration of Benzene (µg/l)

ND Highest concentration of Toluene (µg/l)

ND Highest concentration of Ethylbenzene (µg/l)

ND 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?

One Background sample was collected on 5/7/24.

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

Volume of solid waste (cubic yards) 13

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Closure soil samples will be collected after additional hand excavation.

## REMEDIAL ACTION PLAN

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Due to the close proximity of pipelines, infrastructure, overhead lines, etc. Harvest will continue to use hand shovels to excavate the impacted soil.

### 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.

Harvest intends to continue to hand excavate impacted soil and collect the appropriate amount of closure soil samples from the sidewalls and floor of the excavation. Upon ECMC approval of the reduced analyte list, Harvest will submit all closure samples to an accredited laboratory for analysis of:

- TPH
- 1-Methylnapthalene
- 2-Methylnapthalene
- Barium
- Lead
- Electrical Conductivity
- Sodium Adsorption Ratio
- pH

Harvest estimates NFA status in 60 days.

**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 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.

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

### 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:

# 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.

The excavation will be backfilled with clean fill material and regraded to match the existing site contours. The site is in an active facility and will be reclaimed when the facility is no longer active.

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. 04/29/2024

Actual Spill or Release date, or date of discovery. 04/29/2024

## **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 04/29/2024

Proposed site investigation commencement. 04/29/2024

Proposed completion of site investigation. 08/30/2024

## **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 04/29/2024

Proposed date of completion of Remediation. 09/30/2024

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**

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

Signed: Brooke Herb

Title: Senior Managing Geologist

Submit Date: 07/22/2024

Email: bherb@ensolum.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECOM Rules and applicable orders and is hereby approved.

ECMC Approved: Jason Kosola

Date: 07/26/2024

Remediation Project Number: 36370

**COA Type****Description**

	ECMC approves reduced analyte list as described.
1 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**

403859933	FORM 27-INITIAL-SUBMITTED
403860362	MAP
403860364	PHOTO DOCUMENTATION
403860366	ANALYTICAL RESULTS
403860368	ANALYTICAL RESULTS
403860372	SOIL SAMPLE LOCATION MAP

Total Attach: 6 Files

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

Environmental	ECMC added Spill 486540	07/26/2024
Environmental	No spill number is listed. Contacted operator to confirm spill number to add to form.	07/25/2024

Total: 2 comment(s)