

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

403935214

Receive Date:

10/01/2024

Report taken by:

Krystal Heibel

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

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

Facility Type: SPILL OR RELEASE	Facility ID: 454308	API #: _____	County Name: WASHINGTON
Facility Name: Oil Tanks	Latitude: 39.753103	Longitude: -103.047285	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 36	Twp: 3S	Range: 51W Meridian: 6 Sensitive Area? Yes

## **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.

Relevant depth to groundwater, according to local water well #9056309, ~2950 feet to the southeast of the State location is 76 feet. 3670 feet to the northwest, water well # 9057281 indicates depth to groundwater at 150 feet. Therefore, the Operator is requesting the use of Residential SSL's for this project, as a pathway to groundwater at this project is not likely.

## 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	GROUNDWATER	NA	Lab analysis if encountered
Yes	SOILS	18"	Lab analysis

### 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. 10 In-Situ soil samples and 2 background samples, all at 18" and 24" depth, have been taken as part of this investigation. All samples were grab samples, analyzed for Table 915-1 suite analytes. Sample locations and lat/longs have been provided in the Site Investigation Plan.

### 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 ):

The operator intends to excavate a portion of the impacted area over the next quarter. Additional sampling plans and proposed sampling points, along with excavation plans, have been detailed in this Remediation update.

#### 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 ):

Continued investigation of potential impacts at in-situ points will occur. The expected excavation area can be found in the yellow box in the Site Investigation Report. Follow up sampling will be conducted after the excavation has been complete. Per Doc #403773409, ECOM 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 10

ND Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 7

-- Highest concentration of SAR 11.03  
9

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

BTEX > 915-1 No

Approximate areal extent (square feet) 75

Vertical Extent > 915-1 (in feet) 1

#### 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)

Highest concentration of Ethylbenzene (µg/l)

Number of groundwater monitoring wells installed

Highest concentration of Xylene (µg/l)

Number of groundwater samples exceeding 915-1

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". Additional sampling at 24" will be conducted in the next quarter.

☒ 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?

Further site investigation, including excavation, removal of contaminated soils, and additional sampling is expected to be completed.

### 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.

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 )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 164

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # 983767674

Yes    Natural Attenuation  
\_\_\_\_\_  
Other    \_\_\_\_\_

No    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.

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:

## 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.

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. The State 1&3 will remain an active tank battery location, so full reclamation will not occur at this time.

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. 01/01/2025

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. 03/12/2018

Proposed completion of site investigation. 12/01/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

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**

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

Signed: Mackenzie Smith

Title: Compliance Specialist

Submit Date: 10/01/2024

Email: msmith@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: 10/01/2024

Remediation Project Number: 35820

**COA Type****Description**

	As requested in Doc# 403793239, 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.
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**

403935214	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403937621	SITE INVESTIGATION REPORT
403942265	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 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.	10/01/2024
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.	10/01/2024
Environmental	Per Doc# 403773409, ECMC agrees to the reduced analyte list of sampling for only Table 915-1 Soil Suitability for Reclamation analytes.	10/01/2024

Total: 3 comment(s)