

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

Document Number:

403604559

Receive Date:

08/29/2024

Report taken by:

Steven Arauza

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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers Phone: (970) 285-2739 Mobile: (970) 987-4650
Address: 1001 17TH STREET #1600		
City: DENVER State: CO Zip: 80202		
Contact Person: Brett Middleton	Email: bmiddleton@caerusoilandgas.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 8900 Initial Form 27 Document #: 2313856

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: PIT	Facility ID: 112427	API #: _____	County Name: MESA
Facility Name: FEDERAL 36-1	Latitude: 39.234842	Longitude: -108.172560	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 36	Twp: 9S	Range: 97W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Rangeland

Is domestic water well within 1/4 mile? Yes 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

An ephemeral drainage is located 915 feet north of the remediation project. Three groundwater wells are located 860 to 1,215 feet south of the remediation project. These three monitoring wells indicate total depths ranging from 60 to 70 feet below ground surface but based on conversations with the owner, these wells are dry. Therefore, depth to groundwater at the Location is estimated to be greater than 60 feet below ground surface. A domestic water well located to the east indicates static water level to be approximately 260 feet below ground surface.

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	To be determined	Soil borings and laboratory 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.

In 2015, an open record for the produced water storage pit at the Location was discovered during the Location review in preparation for well plugging and abandonment (P&A) and site final reclamation. Energy & Carbon Management Commission (ECMC) Form 27 Document 2313856 was submitted to document the pending pit investigation, and ECMC Remediation Project Number 8900 was assigned.

Using heavy equipment, an exploratory excavation was opened. Soil samples were collected from the base and sidewalls of the excavation and submitted for laboratory analysis to characterize potential hydrocarbon impacts in and around the location of the former produced water storage pit. Analytical results of initial soil sampling identified soil impacts exceeding ECMC Table 910 allowable limits. Lab results identified levels of organic and inorganic constituents elevated above allowable limits. Form 19 Document 400971468 was submitted to document those findings, and Spill/Release Point ID 444545 was assigned. See the Report of Work Completed (ROWC) associated with Form 27 Document 403569602 for site investigation details.

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):

Once soil vapor extraction (SVE) remediation activities are complete, confirmation soil samples will be collected in the release area to verify compliance with ECMC Table 915-1 Residential Soil Screening Levels (RSSLs). Additional background samples may be collected from comparable, nearby, non-impacted soil. Soil samples are proposed to be analyzed for a reduced list of petroleum hydrocarbons (TPH), xylenes, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and SAR.

Proposed Groundwater Sampling

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

Caerus does not anticipate encountering groundwater during site investigation activities. If groundwater is encountered, Caerus will attempt to collect a representative sample for analysis.

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 108

Number of soil samples exceeding 915-1 73

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

Approximate areal extent (square feet) 1200

NA / ND

-- Highest concentration of TPH (mg/kg) 8700

-- Highest concentration of SAR 67.3

BTEX > 915-1 Yes

Vertical Extent > 915-1 (in feet) 40

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

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?

Multiple background samples were collected at the Location to characterize native levels of inorganic constituents of concern. See the attached ROWC for details.

☐ 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?

See Proposed Sampling Plan and the attached ROWC.

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.

Approximately 1,000 cubic yards of impacted soil were transported to Greenleaf Environmental Services for disposal. Caerus is evaluating potential remedial technologies and pathways to closure to address elevated organic and inorganic constituents.

REMEDICATION 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.

On February 3, 2015 an exploratory excavation was opened, and soil samples were collected from the base and sidewalls. Samples were submitted for laboratory analysis to characterize potential hydrocarbon impacts in and around the location of the former produced water storage pit. Results of initial investigation exceeded ECMC Table 910 allowable limits for organic and inorganic constituents. From May 2015 to March 2022, multiple subsequent site investigations were performed using environmental drilling rigs to determine the vertical and horizontal extents of soil impacts and to install SVE wells. Organic impacts were delineated vertically and horizontally in the March 2022 site investigation, and the ECMC approved a reduced analyte list of TPH, pH, SAR, xylenes, 1,2,4 trimethylbenzene, 1,3,5 trimethylbenzene, and boron via Documents 402976640 and 403351334.

On June 29, 2022, additional investigation was performed to characterize native levels of inorganic constituents at the Location. Two soil borings were advanced to 40 and 55 feet below ground surface (bgs) using a hollow stem drilling rig in nearby, native, non-impacted soil adjacent to the Location. Several soil samples were collected from both soil borings, with samples collected in approximately 10 foot intervals. Two additional background samples were also collected nearby using hand tools. Laboratory results of background sampling indicate elevated levels of electrical conductivity (EC), SAR, pH, and arsenic in native soil.

On August 21, 2023, additional investigation was performed to further characterize native levels of inorganic constituents at the Location. Using hand tools, six soil samples were collected north of the Location from nearby, native, non-impacted soil. See the attached ROWC for site investigation details.

Soil Remediation Summary

☒ In Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

Yes _____ Air sparge / Soil vapor extraction

_____ Natural Attenuation

_____ Other _____

☒ Ex Situ

Yes _____ Excavate and offsite disposal

_____ If Yes: Estimated Volume (Cubic Yards) _____ 1000

_____ 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.

Groundwater has not been encountered at the site. In the event that groundwater is encountered during any future additional investigation, Caerus will attempt to collect a representative sample for analysis.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other

☐ Request Alternative Reporting Schedule:

☒ Semi-Annually ☐ Annually ☐ Other

Caerus is requesting an alternative reporting schedule of semi-annual to account for fieldwork within the summer months and the site being idle in the winter months.

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 Q4 2023, Q1 2024, and Q2 2024 Status Update

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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, Caerus has general liability insurance in the amount of \$1M, and Caerus has umbrella insurance, which sits over the general liability insurance in the amount of \$75M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$76M.

Operator anticipates the remaining cost for this project to be: \$ 200000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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.

Any disturbance will be returned to the active working surface of the well pad for continued operation. When the site is decommissioned at a later date, it will be reclaimed in accordance with 1000 Series regulations.

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. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/03/2015

Proposed site investigation commencement. 02/03/2015

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/03/2015

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

This form has been submitted to provide a status update for Remediation Project 8900. No additional fieldwork was conducted. Please see the attached ROWC for site investigation details and background considerations. Caerus requests consideration of Table 915-1 Footnote 1 to establish alternative allowable limits for SAR and pH. See the attached ROWC for details.

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

Signed: Brett Middleton

Title: Environmental Lead

Submit Date: 08/29/2024

Email: bmiddleton@caerusoilandgas.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: Steven Arauza

Date: 10/02/2024

Remediation Project Number: 8900

COA Type**Description**

	Based on the information provided, the Operator's request for a reduced analyte suite of TPH (GRO/DRO/ORO), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and SAR is approved with the condition below: In addition to the requested analytes, the Operator will continue to analyze soil samples for total xylenes and boron
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**

403604559	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403906152	SITE INVESTIGATION REPORT
403942995	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

Environmental	Comply with outstanding COAs.	10/02/2024
Environmental	Based on the statistical analysis provided for background conditions (doc #403906152). the Operator's request to establish alternative allowable limits of 24.80 for SAR and 10.1 for pH are conditionally approved, per Table 915-1 Footnote 1.	10/02/2024
Environmental	Based on the information provided, the Operator's request for a semi-annual reporting schedule is conditionally approved.	10/02/2024

Total: 3 comment(s)