

State of Colorado
Energy & Carbon Management Commission

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403954600
Receive Date:
10/11/2024

Report taken by:
Laurel Anderson

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 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: <u>ROCKY MOUNTAIN MIDSTREAM LLC</u>	Operator No: <u>10716</u>	Phone Numbers
Address: <u>13781 PACIFIC CIRCLE</u>		Phone: <u>(970) 618-3329</u>
City: <u>MEAD</u> State: <u>CO</u> Zip: <u>80542</u>		Mobile: <u>(970) 618-3329</u>
Contact Person: <u>Annette Garrigues</u>	Email: <u>annette.garrigues@williams.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37365 Initial Form 27 Document #: 403954600

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: <u>SPILL OR RELEASE</u>	Facility ID: <u>466243</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Fort Lupton Compressor Station</u>	Latitude: <u>40.033374</u>	Longitude: <u>-104.790250</u>	
	** correct Lat/Long if needed: Latitude: <u>40.033382</u>	Longitude: <u>-104.790116</u>	
QtrQtr: <u>NWSW</u>	Sec: <u>21</u>	Twps: <u>1N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications OL Most Sensitive Adjacent Land Use Farming/Agricultural
 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? Yes

Other Potential Receptors within 1/4 mile

Freshwater emergent wetland identified on COGIS Mapping System. No other sensitive areas or habitats identified

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	25' x 11'	Excavation, Visual, Olfactory, PID screenings

INITIAL ACTION SUMMARY

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

Hydrate in pipeline caused pipe to shift, from a sudden change in pressure. This caused a 1" threaded connection to fail and released approximately 6 BBLs of condensate onto the ground. The spill was contained on site and the cleanup and repair was initiated. Contaminated soils were excavated from an area approximately 25' L x 11' W and 3' Deep.

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 sampling is proposed to ultimately show compliance with Table 915-1 clean up standards. We propose to sample in a grid pattern, 6 samples in total. We will have samples with the highest PID's (or if groundwater is encountered just above the soil-groundwater interface) analyzed for TPH (C6-C36) and Table 915-1 Organic Compounds in Soil. No metal analyses will occur due to the release being that just of natural gas condensate.

Proposed Groundwater Sampling

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

Groundwater will be sampled and analyzed if encountered.

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 0
Number of soil samples exceeding 915-1 _____
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) _____

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 _____
Vertical Extent > 915-1 (in feet) _____

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?

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?

Soil sampling is proposed to ultimately show compliance with Table 915-1 clean up standards. We propose to sample in a grid pattern, 6 samples in total. We will have samples with the highest PID's (or if groundwater is encountered just above the soil-groundwater interface) analyzed for TPH (C6-C36) and Table 915-1 Organic Compounds in Soil. No metal analyses will occur due to the release being that just of natural gas condensate.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Contaminated soils were excavated and disposed off-site and the excavation backfilled in 2019 under a former RMM employee. No records disposal records or laboratory analytical reports have been located from that timeframe. RMM estimates 30 cubic yards were removed based on the limited information available and statements from other employees whom were witness to the spill response and remediation activities and whom are still employed with RMM.

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.

We will determine the required remediation once we obtain the sample results.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation) Yes Excavate and offsite disposal
_____ Chemical oxidation If Yes: Estimated Volume (Cubic Yards) _____ 30

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.

Operator anticipates the remaining cost for this project to be: \$ 20000

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:

Volume of E&P Waste (solid) in cubic yards 30

E&P waste (solid) description Contaminated soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Tower Disposal - Republic Services (2019). Current disposal: Pawnee Waste

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.

Interim reclamation will be in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes _____

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? No _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? No _____

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. 07/22/2019

Actual Spill or Release date, or date of discovery. 07/22/2019

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/23/2019

Proposed site investigation commencement. 11/13/2024

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/11/2024

Proposed date of completion of Remediation. 12/31/2024

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

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

Signed: Annette Garrigues

Title: Environmental Specialist

Submit Date: 10/11/2024

Email: annette.garrigues@williams.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: Laurel Anderson

Date: 10/17/2024

Remediation Project Number: 37365

COA Type**Description**

	Operator shall provide boring logs in accordance with standard environmental practices. This includes at a minimum; lithology description, USCS classifications, PID readings, sample collection depths, depth to water and well construction (as applicable).
	ECMC approves of the proposed soil sample locations. Proposed soil samples shall be collected at a depth to ensure samples are representative conditions of in-situ soil beneath the backfill of the excavation conducted during initial spill response and remediation. Depending on the results of the current site investigation plan, Operator may be required to collect additional soil samples/install additional soil borings/monitoring wells to fully delineate impacts.
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**

403954600	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403954863	OTHER
403954874	AERIAL IMAGE
403954875	MAP
403954973	SOIL SAMPLE LOCATION MAP
403961565	FORM 27-INITIAL-SUBMITTED

Total Attach: 6 Files

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

Environmental	ECMC agrees to the reduced analyte list based on Operator's process knowledge and the type of E&P waste (condensate after separation) spilled.	10/17/2024
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Total: 1 comment(s)