

State of Colorado
Energy & Carbon Management Commission

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403986687
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11/07/2024

Report taken by:
Laurel Anderson

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: <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>()</u>
Contact Person: <u>Annette Garrigues</u>	Email: <u>annette.garrigues@williams.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37367 Initial Form 27 Document #: 403949769

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>472836</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Mustang Compressor Station</u>	Latitude: <u>40.244736</u>	Longitude: <u>-104.605803</u>	
	** correct Lat/Long if needed: Latitude: <u>40.245341</u>	Longitude: <u>-104.606344</u>	
QtrQtr: <u>NENE</u>	Sec: <u>12</u>	Twp: <u>3N</u>	Range: <u>65W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

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

Other Potential Receptors within 1/4 mile

HPH for Bald Eagle Active Nest Site within 1/2 mile. Freshwater pond within 1/2 mile.

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	Unknown	Visual, Olfactory, and Excavation.

INITIAL ACTION SUMMARY

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

Based on the original report, no hydrocarbon material was apparently released to the ground, and any potential material spilled to the ground was reported to have been incinerated due to the fire event. Approximately 3 mcf of natural gas was estimated to be combusted at the pig launcher and receiver, while the system was depressurized. If anything was released to the ground, it was natural gas condensate liquids. Follow-up sampling was conducted, however sampling data cannot be found. Some soils were excavated in 2020, the excavation was approximately 120' x 60' x 2-3' deep. The project was being managed by someone who no longer works for Rocky Mountain Midstream.

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):

We will sample in a grid in the spill area (a minimum of 10 samples). Samples with highest PIDs (or if groundwater is encountered just above the soil-groundwater interface) will be analyzed for TPH (C6-C36) and Table 915-1 Organic Compounds in Soil. The product potentially released was Natural Gas Condensate, so we would like to omit for testing of metals. We have confirmation from the firefighting districts that if any foam was used, the type of foam that would have been used does not contain PFAS. Please see attached documentation. We do not plan to analyze any samples for PFAS.

Proposed Groundwater Sampling

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

We will collect groundwater samples, if groundwater is 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?

See proposed sampling plan

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.

The incident occurred back in 2020, when pigging liquids that were being unloaded out of the barrel caught fire. The source has been stopped. Contaminated soils were excavated and disposed off-site (Republic Services - Tower Road) and the excavation backfilled in 2020 under a former RMM employee. No records disposal records or laboratory analytical reports have been located from that timeframe. RMM estimates 500 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.

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.

We will determine the remediation required once we obtain the analytical data.

Soil Remediation Summary

In Situ Ex Situ

Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Air sparge / Soil vapor extraction
 Natural Attenuation
 Other _____

Yes Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards)
Name of Licensed Disposal Facility or ECMC Facility ID # _____
No Excavate and onsite remediation
 Land Treatment
 Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Other _____

Groundwater Remediation Summary

No Bioremediation (or enhanced bioremediation)
No Chemical oxidation
No Air sparge / Soil vapor extraction
No Natural Attenuation
No 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.

We will sample groundwater if encountered.

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? Yes

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

Volume of E&P Waste (solid) in cubic yards _____ 500

E&P waste (solid) description Contaminated soil

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Republic services tower disposal

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.

Interim reclamation will be completed 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. 11/30/2024

Proposed date of completion of Reclamation. 05/31/2025

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. 03/02/2020

Actual Spill or Release date, or date of discovery. 03/02/2020

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/02/2020

Proposed site investigation commencement. 11/12/2024

Proposed completion of site investigation. 11/20/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/02/2024

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

Supplemental F27 is being submitted to show the firefighting form that may have been used at the site does not contain PFAS -- Therefore we are requesting to omit the samples to be analyzed for PFAS.

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: 11/07/2024

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: 11/13/2024

Remediation Project Number: 37367

COA Type**Description**

COA Type	Description
0 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**

403986687	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403986725	OTHER
403986728	OTHER
403986729	OTHER
403986730	OTHER
403986732	SAFETY DATA SHEETS
403992462	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

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

Environmental	ECMC agrees to the reduced analyte list based on the information provided.	11/13/2024
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Total: 1 comment(s)