

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

11/27/2024

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 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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (720) 830-7549
City: DENVER	State: CO	Zip: 80202
Contact Person: Derek Horn	Email: dhorn@qb-energy.com	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38041 Initial Form 27 Document #: 403958218

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: PIT	Facility ID: 112351	API #: _____	County Name: MESA
Facility Name: DEBEQUE 8-13	Latitude: 39.282050	Longitude: -108.249129	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWSW	Sec: 8	Twp: 9S	Range: 97W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 312645	API #: _____	County Name: MESA
Facility Name: DEBEQUE-69S97W 8CSW	Latitude: 39.283900	Longitude: -108.246849	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: CSW	Sec: 8	Twp: 9S	Range: 97W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Rangeland

Is domestic water well within 1/4 mile? No

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

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	SOILS	To be determined	Field Investigation and 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.

This form is being submitted to serve as the initial notification to abandon the pit identified by ECMC as Facility ID #112351 upon agency approval.

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 samples will be collected in accordance with the ECMC Rules in the 900 series.
The sample areas of interest based on early inspection reports (Wells1249098 and Wells221091) will target the areas immediately adjacent to the tank.
Grab samples will be collected from soil vertically below these areas and submitted for laboratory analysis of all analytes listed in ECMC Table 915-1.
Please see the attached site diagram for exact locations where samples are expected to be collected from. See referenced inspection reports in the attachments.

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 5

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

NA / ND

ND Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1 No

Approximate areal extent (square feet) 0

Vertical Extent > 915-1 (in feet) 15

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?

One background soil boring was analyzed at depths of 10' and 15' below ground surface as part of the initial site investigation. Additional background samples will be collected for the location.

☐ 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?

Samples are to be collected and analyzed at SB01, SBO2, and SB03 in attempts to determine delineation for EC and SAR (see analytical data attached and site diagram). Additional background samples will be collected and analyzed for the location.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Additional soil sampling required to determine extent. Upon delineation of impacted area, a source of removal will be determined.

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.

Remediation will be determined based on field findings. Upon approval of reduced analyte suite, only remaining constituents of concern are SAR and EC exceedances. EC exceedances observed at SB01, SB02, and SB03. SAR exceedance above background observed at SB02@15. SAR exceedances were also observed at SB01 and SB03 below background levels. All 3 locations will be analyzed for EC and SAR during further investigation.

October 28, 2024 QB Energy coordinated HRL to advance three exploratory soil borings in attempts to find impacts from an historic pit based on an inspection performed October 2, 1996. See inspection report attached referencing a small pit next to the tank. Given the limited information QB performed soil boring on the three sides of the tank where this could have existed. Soil borings were advanced to 15' bgs and analyzed for full table 915-1. Upon results, the only exceedance's above background levels were observed with EC and SAR. Based on background sampling QB is requesting a reduced analyte suite of EC and SAR. (Lab data and tables attached)

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards)

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

_____ Natural Attenuation
_____ Other _____

_____ 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 Q4 2024 REM 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: \$ 30000

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? No

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 will be completed once all site closure assessments and remediation, if necessary, activities are completed.

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/24/2024

Proposed site investigation commencement. 10/25/2024

Proposed completion of site investigation. _____

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

This form is being submitted to provide an update to the De Beque 08-13 Pit exploration. After initial soil boring analysis QB is requesting a reduced analyte suite of EC and SAR. 1 methylnaphthalene and Naphthalene are less than the labs MDL of 0.01 mg/kg. No table 915-1 organic exceedances are observed for any other constituents therefore QB requests all organic constituents be removed from the sampling suite.

Using background soil samples SB03 had a pH of 8.62 that is below background PLBG @10 with a pH of 9.51. All soil samples had arsenic exceedances that are below the background PLBG@15' of 2.19 mg/kg. Barium was observed for exceedances at all soil borings, but below the background sample at PLBG@10 with 346.13 mg/kg. Chromium VI was observed less than the labs 0.08 mg/kg MDL. All soil borings observed exceedances of selenium but were below the background sample of PLBG15' of 6.28 mg/kg.

All other constituents were below protection of groundwater sampling limits and are requested to be removed from the suite. (Boron, cadmium, copper, lead, nickel, silver, zinc)

Upon approval of this form for a reduced analyte suite, additional samples are to be collected at SB01, SB02, and SB03. Additional background samples will be included in further site investigation.

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

Signed: Derek Horn

Title: EHS Specialist

Submit Date: 11/27/2024

Email: dhorn@qb-energy.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: 12/04/2024

Remediation Project Number: 38041

COA Type

Description

	Additional assessment is required to establish appropriate background levels for EC and SAR. Collect additional background samples to establish appropriate background levels for EC and SAR, as indicated on this Site Investigation Plan under "Were background samples collected as part of this site investigation?"
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.

<u>Att Doc Num</u>	<u>Name</u>
403995079	FORM 27-SUPPLEMENTAL-SUBMITTED
403995977	OTHER
403995979	REMEDATION PROGRESS REPORT
403995981	ANALYTICAL RESULTS
403995982	ANALYTICAL RESULTS
403996014	ANALYTICAL RESULTS
403996016	ANALYTICAL RESULTS
404010124	MAP

Total Attach: 8 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Preliminary analytical results (doc #403996014) indicate that naturally-occurring levels for EC and SAR may exceed Table 915-1. However, additional information is required to establish appropriate background concentrations due to the fact that background levels have only been assessed from a single location, at two samples. See COA above.	12/04/2024

Environmental	Based on the information provided, the Operator's request for a reduced analyte suite of SAR and EC-only is conditionally approved.	11/25/2024
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Total: 2 comment(s)