

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

404036438

Receive Date:

12/20/2024

Report taken by:

Jason Kosola

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: FRITZ & DIGMAN INC	Operator No: 31250	Phone Numbers
Address: PO BOX 70024		Phone: (505) 419-8420
City: ALBUQUERQUE	State: NM	Zip: 87197-0024
Contact Person: Marie Florez	Email: marie@walsheng.net	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 38333 Initial Form 27 Document #: 404036438

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: WELL	Facility ID: _____	API #: 067-06141	County Name: LA PLATA
Facility Name: DAKOTA FEE 1	Latitude: 37.069947	Longitude: -108.153416	
** correct Lat/Long if needed: Latitude: 37.069830		Longitude: -108.153070	
QtrQtr: SWSE	Sec: 28	Twp: 33N	Range: 12W Meridian: N Sensitive Area? No

Facility Type: SPILL OR RELEASE	Facility ID: 488742	API #: _____	County Name: LA PLATA
Facility Name: SPILL/RELEASE POINT	Latitude: 37.069830	Longitude: -108.153070	
** correct Lat/Long if needed: Latitude: 37.069830		Longitude: -108.153070	
QtrQtr: SWSE	Sec: 28	Twp: 33N	Range: 12W Meridian: N Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications GW _____

Most Sensitive Adjacent Land Use .25 mile away
from an arroyo-
show on map _____

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? 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
Yes	SOILS	771 square feet	oil ran over the top soil

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 spill was immediately contained by earthen berms until a hydrovac and backhoe could be mobilized to start the cleanup. Oil booms will be placed around the area that was impacted until the P&A operations are complete. At that point the P&A equipment (rig & related equipment) will be moved off location and any remnants of the spill will be removed.

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):

Walsh will conduct grab samples once the impacted soil is removed. A grab samples will be taken once the pumping unit, oil tank, separator and meter house is removed from the site.

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 0

Number of soil samples exceeding 915-1 0

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

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

BTEX > 915-1

Approximate areal extent (square feet) 771

Vertical Extent > 915-1 (in feet)

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?

☐ 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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Third party contractor will remove the contaminated soil with a backhoe and dispose at an approved disposal facility.

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.

Walsh engineering proposes to remove the remainder of the contaminated soil within the affected 771 square feet by using heavy equipment consisting of either a backhoe or a track hoe. The removal will consist of at least an additional two to three truckloads consisting of ~20 cubic yards each. Once the impacted soil is removed and disposed of at an approved disposal facility, The samples will consist of 2 five-point composite samples of ~500 square feet each. The soil samples will be placed into individual laboratory 4-ounce jars, capped head space free, and transported on ice to Envirotech Analytical Laboratory. Once the results are finalized Walsh Engineering, on behalf of Fritz & Digman, will submit Form 19 for closure. Once excavation sample results pass, backfill will be applied to the excavated area.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 40

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

Natural Attenuation

Excavate and onsite remediation

Other _____

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: \$

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? ☐

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:

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.

An email was sent to the landowner to confirm specific details for the reclamation.

A reclamation consists of restoring the surface of disturbed land as nearly as practicable to its condition prior to the commencement of oil and gas operations .

The site recontoured and seedbed preparation with the natural soil horizons, the surface will be ripped, disked, and seeded.

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? 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. 01/20/2025

Proposed date of completion of Reclamation. 01/24/2025

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. 12/18/2024

Actual Spill or Release date, or date of discovery. 12/12/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/12/2024

Proposed site investigation commencement. 12/31/2024

Proposed completion of site investigation. 12/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/23/2024

Proposed date of completion of Remediation. 12/27/2024

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:

Facility removal will begin on Monday 12/23/24. Remediation of soil removal will begin Monday 12/23/24 for the impacted area and once equipment is removed. If any changes to the remediation or equipment removal a notification will be emailed.

OPERATOR COMMENT

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

Signed: Marie Florez

Title: Regulatory

Submit Date: 12/20/2024

Email: marie@walsheng.net

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: Jason Kosola

Date: 12/31/2024

Remediation Project Number: 38333

COA Type**Description**

	WELL CLOSURE Operator will submit a sample from an area of the well excavation exhibiting the highest degree of impact, or in the absence of apparent impacts, Operator will submit a sample from the base of the excavation adjacent to the Well along with photo logs of the excavation and surface areas.
	Sampling After Equipment Removed: Proposed soil samples shall be collected at a depth to ensure samples are representative conditions of in-situ soil beneath the backfill of excavations conducted during removal of the former equipment.
	Facility Closure Supplemental Report Timing: Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2)
	Facility Closure Initial Report Timing: Rule 911.a.(1) requires that "Operators will obtain the Director's approval of a Form 27 prior to conducting any investigation or closure activities." The timing of this submission and indicates activities subject to Rule 911.a.(1) began without the required prior approval.
	Operator references both "grab" and "composite" soil samples. Composite samples are not allowed for documenting spill clean up or Table 915-1 compliance. Operator shall collect discreet grab samples and run full Table 915-1 soil suite on each discrete grab sample. Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
5 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**

404036438	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
404036678	MAP
404036799	AERIAL IMAGE
404043892	FORM 27-INITIAL-SUBMITTED

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Well plugged without an approved F27.	12/21/2024
Environmental	ECMC added Spill number 488742	12/21/2024

Total: 2 comment(s)