

State of Colorado
Energy & Carbon Management Commission

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Receive Date:
11/27/2024

Report taken by:
Krystal Heibel

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: <u>CENTRAL OPERATING INC</u>	Operator No: <u>14855</u>	Phone Numbers
Address: <u>1600 BROADWAY STE 1050</u>		Phone: <u>(303) 8949576</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Cullin Johnson</u>	Email: <u>coidenverproduction@gmail.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35820 Initial Form 27 Document #: 403793239

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: <u>LOCATION</u>	Facility ID: <u>317067</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>STATE-63S51W 36SWNW</u>	Latitude: <u>39.751720</u>	Longitude: <u>-103.045272</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>36</u>	Twp: <u>3S</u>	Range: <u>51W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>454308</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>Oil Tanks</u>	Latitude: <u>39.753103</u>	Longitude: <u>-103.047285</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>36</u>	Twp: <u>3S</u>	Range: <u>51W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use crop land

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? Yes

Other Potential Receptors within 1/4 mile

Per NRCS USDA Web Soil Survey: Planter loam, 0 to 3 percent slopes.
Moderately low ability to transmit water (Ksat) with depth to water table at more than 80 inches.
Relevant depth to groundwater, according to local water well #9056309, ~2950 feet to the southeast of the State location is 76 feet. 3670 feet to the northwest, water well # 9057281 indicates depth to groundwater at 150 feet. Therefore, the Operator is requesting the use of Residential SSL's for this project, as a pathway to groundwater at this project is not likely.



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	GROUNDWATER	NA	Lab analysis if encountered
Yes	SOILS	2'	Lab 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.

The treater lost gas pressure and oil tanks leaked 10 bbls oil. The wells were shut in and all valves on treater were shut in. All fluid was contained inside the berms and then recovered with a vacuum truck. Contaminated dirt was immediately removed and stockpiled on location.

Soil samples were collected on 4/15/2024, 7/24/2024 Excavation was conducted in September and additional soil samples were collected on 10/11/2024 and analyzed for Boron, EC, pH and SAR.

Excavation of the impacted area was completed in September 2024, and additional sampling was completed on 10/11/2024. Four excavation wall samples, and one floor sample were taken at 3' & 4' depth of the excavation area. These samples were analyzed for SSR constituents.

Following points are determined to have impacts still:
EX01 @ 3' (pH) & 4' (pH & SAR), EX03 @ 3' & 4' (pH & SAR), F01 @ 3' & 4' (pH & SAR)
SP7 @ 18" & 2' (SAR), SP6 @ 18" (pH & SAR) & 2' (SAR), SP8 @ 18" (SAR), SP9 @ 18" & 2' (SAR), SP5 @ 18" (SAR & pH), SP2 @ 18" (pH & SAR) & 2' (SAR), and SP3 @ 18" (pH & SAR) & 2' (SAR)

Sample locations, lat/longs, and soil sampling maps have been provided in the Site Investigation Plan.

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):

Additional samples will be collected to delineate. Central requests a reduced analytical suite for pH and SAR only.

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 28

Number of soil samples exceeding 915-1 18

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 75

NA / ND

ND Highest concentration of TPH (mg/kg) _____

-- Highest concentration of SAR 13.97

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 2

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

0 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?

2 background samples have been collected as part of the investigation. Both samples were collected at depths of 18", 2', 3', and 4'.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 164

Volume of liquid waste (barrels) 0

Is further site investigation required?

Further site investigation, including excavation, removal of contaminated soils, and additional sampling may be completed for this site investigation.

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.

Contaminated soil was hauled to CSI Landfill. Soil sampling will continue to be done until results prove no exceedances of Table 915 thresholds.

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.

All excavated soil will be removed from location and disposed of at a certified disposal facility.

Soil Remediation Summary

In Situ

Ex Situ

Bioremediation (or enhanced bioremediation)
 Chemical oxidation
 Air sparge / Soil vapor extraction
Yes 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

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 _____ Quarterly Site Investigation Report 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.

Central has financial assurance bonding per Rule 702 and carries General Liability Insurance compliance with Rule 705. No claim is anticipated for this cleanup effort.

Operator anticipates the remaining cost for this project to be: \$ 1000 _____

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:

Contaminated soil was combined with soil from onsite skim pit closure, and hauled to CSI Landfill.

Volume of E&P Waste (solid) in cubic yards _____ 164

E&P waste (solid) description _____ hydrocarbon bearing soil

ECMC Disposal Facility ID #, if applicable: _____ 983767674

Non-ECMC Disposal Facility: _____

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.

Reclamation Plan to be determined after the extent of impact is confirmed. The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules or per surface owner direction. The State 1&3 will remain an active tank battery location, so full reclamation will not occur at this time.

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. 04/01/2025

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. 03/12/2018

Actual Spill or Release date, or date of discovery. 03/12/2018

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/12/2018

Proposed site investigation commencement. 03/12/2018

Proposed completion of site investigation. 12/01/2024

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

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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: Mackenzie Smith

Title: Staff Engineer

Submit Date: 11/27/2024

Email: msmith@ardorenvironmental.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: _____

Date: _____

Remediation Project Number: 35820

COA Type**Description**

0 COA	
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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
404005828	FORM 27 DENIED
404005947	SOIL SAMPLE LOCATION MAP
404009372	ANALYTICAL RESULTS
404009373	ANALYTICAL RESULTS
404009380	SITE INVESTIGATION REPORT
404127018	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 6 Files

General Comments

User Group	Comment	Comment Date
Environmental	ECMC has denied this Form 27 for data validation. Attached analytical is not secured. Operator will provide laboratory analytical report(s) as a stand-alone attachment(s) on the replacement Supplemental Form 27. The Laboratory Report PDF(s) must be secured by the issuing laboratory; If there is a difference between the creation date and secured date of the PDF, Operator shall provide an explanation in the case narrative of the associated report. ECMC will not review combined PDFs with lab reports.	03/13/2025

Total: 1 comment(s)