

State of Colorado
Energy & Carbon Management Commission

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Receive Date:

Report taken by:

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>BONANZA CREEK ENERGY OPERATING COMPANY LLC</u>	Operator No: <u>8960</u>	Phone Numbers
Address: <u>555 17TH STREET SUITE 3700</u>	City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Phone: <u>(907) 8886089</u>
Contact Person: <u>Seth Robinson</u>	Email: <u>srobinson@civiresources.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36710 Initial Form 27 Document #: 403868630

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: Equipment Removal.

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>486735</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>State Seventy Holes P-4</u>	Latitude: <u>40.348513</u>	Longitude: <u>-104.326891</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>4</u>	Twp: <u>4N</u>	Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>490218</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>State Seventy Holes P-4</u>	Latitude: <u>40.348340</u>	Longitude: <u>-104.326275</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNE</u>	Sec: <u>4</u>	Twp: <u>4N</u>	Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use non-crop land

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:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	N/A	Laboratory Analytical if Encountered
Yes	SOILS	NA	Laboratory Analytical

INITIAL ACTION SUMMARY

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

Spill ID 486735: a compromised oil dump line resulted in 8 gallons of oil to spill to the surface and a currently unknown volume to spill to the subsurface. A vac truck was immediately dispatched to remove the surface impacts, and the line was exposed and repaired.

Spill ID 490218: A site investigation will be completed pursuant to ECMC rule 911 at the State Seventy Holes P-4 oil and gas location pertaining to the removal of 11 separators, removal and replacement of oil and water lines between separators and tanks. The site will transition to a bulk and test separator setup, relocating underground oil/water lines to an above-ground pipe rack system.

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):

Spill ID 486735: Source removal for this spill is complete. Fifty-four (54) grab confirmation soil samples were collected and submitted for TPH (C6-C36) and Organic Compounds in Soils as previously approved on Form 19 Doc #403777903. Confirmation samples complied with ECMC Table 915-1.

We removed 11 separators and removed and replaced the oil and water line between separators and tanks. We transitioned to a bulk and test separator setup, relocating the underground oil/water lines to an above-ground pipe rack system. Grab confirmation soil samples were collected from beneath the separators, the start/end points, change of pipe direction, and change of material on the oil and water lines. Sample location map is attached.

Spill ID 490218: While conducting facility decommissioning activities, historical impacts were discovered. The impacted soil will be removed and hauled for disposal. Confirmation soil samples will be collected and submitted for analysis of ECMC Table 915-1.

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 163

Number of soil samples exceeding 915-1 79

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

Approximate areal extent (square feet) 6154

NA / ND

-- Highest concentration of TPH (mg/kg) 460

-- Highest concentration of SAR 8.22

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 16

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 0

Number of groundwater samples exceeding 915-1 0

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA 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?

Fifteen (15) background soil samples were collected from homogenous soil horizons and/or corresponding excavation confirmation soil sample depths.

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

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.

Spill ID 486735: Source removal for this spill is complete. Approximately 3000 cubic yards of soil were removed and hauled for disposal. Fifty-four (54) confirmation soil samples were collected and submitted for TPH (C6-C36) and Organics as previously approved on Form 19 Doc #403777903. All samples came back non-detect. Laboratory reports are attached (L1771283 and L1772177). The Excavation summary report and NFA request is attached.

Spill ID 490218 and equipment removal: The source is being removed through mechanical excavation. Grab confirmation soil samples will be collected and submitted to a certified laboratory for analysis of Table 915-1 metals and organic compounds, TPH C6-36, EC, SAR, pH, and boron to determine the lateral and vertical extent of impacts. Background samples will be collected from homogenous soil horizons and/or corresponding excavation sample depths. Source removal is ongoing. To date, one-hundred and nine (109) grab soil samples have been collected, along with approximately 6,867 cubic yards have been removed and hauled for disposal.

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.

Once source removal is completed, an estimated timeframe to achieve NFA status is January 31, 2026.

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) _____ 9867
- _____ 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 Remediation update report

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.

The General Liability coverage within the Civitas Resources insurance program includes coverage for bodily injury, property damage, and pollution clean-up costs arising from qualifying pollution events of a sudden and accidental nature subject to a \$1,000,000 per occurrence limit and \$2,000,000 aggregate limit. The Civitas Resources insurance program includes Excess Liability coverage of \$110,000,000 per occurrence and in the aggregate which sits over the sudden and accidental pollution within the General Liability coverage. It is the opinion of Civitas Resources that this total tower of limit is adequate to address the costs of remediation associated with any qualifying pollution event.

Operator anticipates the remaining cost for this project to be: \$ 500000

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:

There is no beneficial use for E&P Waste derived from this remediation project.

Volume of E&P Waste (solid) in cubic yards 9867

E&P waste (solid) description E&P waste derived from oil and gas activity

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Pawnee Waste, LLC

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.

The site will remain an active oil and gas facility. Reclamation will be in accordance with ECMC 1000 Series Rules.

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. 05/03/2024

Actual Spill or Release date, or date of discovery. 05/02/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/02/2024

Proposed site investigation commencement. 05/02/2024

Proposed completion of site investigation. 07/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/01/2024

Proposed date of completion of Remediation. 01/31/2026

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:

I updated the proposed date of completion of remediation to more accurately reflect our projected timeline.

OPERATOR COMMENT

Spill ID 486735: Source removal for this spill is complete. In response to a COAs received on Form 27 (Doc# 404033214), laboratory analytical reports for this spill are attached to this Form 27 submittal. Laboratory report attachment pdf number L1772177 and L1771283 are locked, secured, and functioning correctly. The remediation progress report and NFA are also attached to this Form 27 submittal.

Spill ID 490218 and equipment removal work: Source removal for this scope of work is ongoing, and analytical sample results are pending. The results will be reported on a subsequent Form 27. Analytical data collected so far is attached and presented in the Remediation Progress Report (dated February & May 2025). The analytical laboratory reports received so far for this scope of work are attached (2502142, L1862871, and L1863457).

We received COAs and Form 27 denials (Doc# 404033214, dated 12/18/2024 and 404133702, dated 3/19/2025) pertaining to a sampling plan for equipment removal and reroute activities. We note that this plan was presented in approved Form 27 (Doc# 403931858). Within this Form 27 submittal, we have attached a detailed soil sample location map, along with more specific sample locations descriptions for the removal and reroute scope of work.

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

Signed: Seth Robinson

Title: Senior Env Specialist

Submit Date: _____

Email: srobinson@civiresources.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: 36710

COA Type**Description**

<u>COA Type</u>	<u>Description</u>
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**

404393070	LABORATORY ANALYTICAL REPORT
404393081	LABORATORY ANALYTICAL REPORT
404393393	REMEDATION PROGRESS REPORT
404393397	SOIL SAMPLE LOCATION MAP

Total Attach: 4 Files

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

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)