

State of Colorado
Energy & Carbon Management Commission

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403638030
Receive Date:
01/12/2024

Report taken by:
Chris Sanchez

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 COGCC 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>MULL DRILLING COMPANY INC</u>	Operator No: <u>61250</u>	Phone Numbers Phone: <u>(316) 895-1596</u> Mobile: <u>()</u>
Address: <u>1700 N WATERFRONT PKWY B#1200</u>		
City: <u>WICHITA</u>	State: <u>KS</u>	Zip: <u>67206-6637</u>
Contact Person: <u>Dustin Damme</u>	Email: <u>ddamme@mulldrilling.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27401 Initial Form 27 Document #: 403295381

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>WELL</u>	Facility ID: _____	API #: <u>017-07151</u>	County Name: <u>CHEYENNE</u>
Facility Name: <u>NORTHWEST ARAPAHOE UNIT 37</u>	Latitude: <u>38.880570</u>	Longitude: <u>-102.143270</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>32</u>	Twp: <u>13S</u>	Range: <u>42W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>321848</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>NORTHWEST ARAPAHOE UNIT-613S42W 32SWNW</u>	Latitude: <u>38.880570</u>	Longitude: <u>-102.143270</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNW</u>	Sec: <u>32</u>	Twp: <u>13S</u>	Range: <u>42W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Pasture Land

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? No

Other Potential Receptors within 1/4 mile

Cattle

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	TBD	Lab analysis if encountered
UNDETERMINED	SOILS	TBD	Sample 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.

Initial sampling was conducted on 4/13/2023, 7 total samples (including 2 BG) were collected. Analytical results reveal no organic impacts at the WH. Excavation and confirmation sample(s) will be collected at SP2. Mull would like to request a reduced analytical suite for confirmation samples for Arsenic only. Additionally, soil will be field screened every 250' along the FL as per COA in most recent Form 27 (Doc 403437416). If any soil screening location displays and elevated PID reading, it will be sent to an accredited laboratory for Full Table 915-1 analysis.

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):

SP2 contained Arsenic at levels greater than the Local Clean-Up Level. Excavation and confirmation samples will be collected here. Mull would like to request a reduced analytical suite for confirmation samples for Arsenic only.

Proposed Groundwater Sampling

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

If encountered, a minimum of one grab sample will be collected as soon as practical. Groundwater sample(s) will be analyzed for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chlorides) and organic compounds in water.

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	NA / ND
Number of soil samples collected <u>5</u>	-- Highest concentration of TPH (mg/kg) <u>109.1</u>
Number of soil samples exceeding 915-1 <u>1</u>	-- Highest concentration of SAR <u>1.25</u>

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

BTEX > 915-1 No

Approximate areal extent (square feet) 50

Vertical Extent > 915-1 (in feet) 1

Groundwater

Number of groundwater samples collected 0

NA Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

NA Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

NA Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

NA Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

Two background samples were collected on 4/13/2023 SP5 and SP6

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?

The FL will be assessed every 250' per COA on previous SF27 (Doc403437416). Additional excavation and confirmation samples will be collected around impacted sample location SP2.

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.

Impacted Soils, as required, will be removed to a landfill.

REMEDATION 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.

Further delineation of inorganic impacts will be conducted via soil sampling.

Soil Remediation Summary

In Situ

Ex Situ

 Bioremediation (or enhanced bioremediation)

 Excavate and offsite disposal

 Chemical oxidation

 If Yes: Estimated Volume (Cubic Yards) 0

 Air sparge / Soil vapor extraction

 Name of Licensed Disposal Facility or COGCC Facility ID # _____

 Natural Attenuation

 Excavate and onsite remediation

 Yes Other pH modifiers _____

 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.

NA

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 Remedial Progress _____

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 is in compliance with Rule 705 insurance requirements as well as Rule 702 Financial Assurance. The estimated cost below will cover additional excavation, sampling, and analytical towards closure.

Operator anticipates the remaining cost for this project to be: \$ 5000 _____

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 _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC 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 COGCC 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 shall commence once inorganics are delineated.

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? Yes

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/30/2024

Proposed date of completion of Reclamation. 12/01/2026

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). 01/19/2023

Proposed site investigation commencement. 11/01/2023

Proposed completion of site investigation. 12/31/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/01/2024

Proposed date of completion of Remediation. 12/31/2026

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:

OPERATOR COMMENT

SP5 was collected in a non-impacted native location and is considered a background sample. Delineation will not occur at this sample site. Form 44 for FL abandonment has been submitted and is in review (Doc 403300970)

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

Signed: Taylor Cordts

Title: Staff Engineer

Submit Date: 01/12/2024

Email: tcordts@ardorenvironmental.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: Chris Sanchez

Date: 02/09/2024

Remediation Project Number: 27401

COA Type**Description**

	<p>ECMC noted, Form 27 Document # 403437416 received on 06/19/2023 the Operator states the Following; "One one sample exhibited a elevated pH Value. A soil conditioner shall be applied to the location during reclamation phase processes to lower the alkalinity slightly. No other impacts were indicated. For a full analysis please look at the attached letter report." Form 27 Document # 403546632 received on 9/30/2023 States; "Identify high pH levels around SP5 location with additional points, and at depth." Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil</p>
	<p>In addition to Field Screening every 250 feet the Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater.</p>
	<p>ECMC approves the Operators request for a reduced analytical suite for confirmation samples at SP2 for Arsenic.</p>
	<p>Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2).</p>
	<p>Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area</p>
5 COAs	

Attachment Check 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**

403638030	FORM 27-SUPPLEMENTAL-SUBMITTED
403639343	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)

Date Run: 2/9/2024 Doc [#403638030]