

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203

Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

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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: WELLINGTON OPERATING COMPANY	Operator No: 95233	Phone Numbers
Address: 15301 DALLAS PKWY SUITE 900		Phone: (970) 567-6871
City: ADDISON	State: TX	Zip: 75001
Contact Person: Cameron Gracey	Email: Graceyservices@msn.com	Mobile: (970) 567-6871

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28548 Initial Form 27 Document #: 403339472

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

No Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 069-05168	County Name: LARIMER
Facility Name: WELLINGTON MUDDY UNIT/GAULT-PIATT 20-3		Latitude: 40.763890	Longitude: -105.045310
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNE	Sec: 7	Twp: 9N	Range: 68W
Meridian: 6		Sensitive Area? No	

SITE CONDITIONS

General soil type - USCS Classifications GC

Most Sensitive Adjacent Land Use Crops

Is domestic water well within 1/4 mile? Yes

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) Stained Soils if discovered

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Not yet known	Visual

INITIAL ACTION SUMMARY

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

There is no action to be taken at this time as excavation has not yet begun. Well has not produced for some time. No visual evidence of E&P Waste on surface.

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):

Depending on the excavation and pending discovery of wellbore fluids staining of the soil during excavation, soil samples will be collected.

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 16

Number of soil samples exceeding 915-1 5

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

Approximate areal extent (square feet) 1435

NA / ND

Highest concentration of TPH (mg/kg) 9021.3

Highest concentration of SAR 2.74

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 10

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

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 sample was collected near the surface grade in the crop field adjacent to the well site. Additional background sampling at 12" to 18" in depth and at 8' in depth are pending and will be analyzed once they are collected.

☐ 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?

03/22/2024 - Laboratory data for ten samples is included with this Form 27 Supplemental. Six additional samples have been collected and submitted for analysis and the results are still pending. Additional two background samples need to be collected and submitted for analysis.

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.

There is no current source of contamination.

03/22/2024 - Stained soils were discovered during excavation of the well head on February 22, 2024 and continued on 02/23/2024. The area around the well head was excavated past the discolored soils to points that the handheld PID readings were at or near 0.0. ECMC was notified on 02/23/2024 and Richard Allison of ECMC conducted a site visit to view the excavation on 02/26/2024. All soil that were suspected of being impacted by petroleum products were manifested and transported to Pawnee Waste LLC for disposal beginning on 02/26/2024.

REMEDICATION 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.

There are no known impacts to the soil at this time. If stained soils are found, they will be excavated & remediated in situ. Soil sampling will be conducted as requested by the State per table 915-1.

03/22/2024 - The impacted soils have been removed. Stained soils were discovered during excavation of the well head on February 22, 2024, The area around the well head was excavated past the discolored soils to extents that the PID reads were at or near 0.0. ECMC was notified on 02/23/2024 and Richard Allison of ECMC conducted a site visit to view the excavation on 02/26/2024. All soil that were suspected of being contaminated by petroleum products were manifested and transported to Pawnee Waste LLC for disposal beginning on 02/26/2024.

The report results for initial soil sample collected at the level that the impacted layer was found at indicates that the excavation was cleared of the impacted soils. Mr. Allison of ECMC requested that additional soil samples be collected and analyzed in near the crop root zone for the agricultural field, which was done and the results are still pending from Pace Laboratory. Additionally, two soil samples were collected from the area where the impacted soils had been stockpiled prior to shipping from the site, and the results are still pending.

Once all the soil samples have been reported based on field screening WOC expects to be able to request final closure for this well.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 410

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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.

There is no known impact to groundwater at this time.

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? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

All waste soils containing Total TPH and Oil & Grease in excess of the Table 915 limit were disposed at Pawnee Waste LLC. There was no beneficial use of these soils.

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?

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 well has been shut-in and TA'd for a long period of time and there has been no production of downhole fluid for many years. During plugging and excavation of wellhead & casing, if any stained soils are discovered they will be remediated in situ. Soil testing will be completed per table 915-1. The site will then be reclaimed and utilized for crops per the landowner. Flowlines will be abandoned per the attached procedure & diagram.

03/22/2024 - Pending final closure of this well and the historic spill/release the excavation has been backfilled, graded, ripped and reseeded so that the surface owner can use the area unimpeded for his agricultural crop beginning in April 2024. This area is currently used to produce grass hay. There was no gravel found in the access road or on the well pad during excavation.

Is the described reclamation complete? Yes _____

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. 03/13/2023

Proposed date of completion of Reclamation. 04/30/2024

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. 02/22/2024

Actual Spill or Release date, or date of discovery. 02/22/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/06/2023

Proposed site investigation commencement. 03/13/2023

Proposed completion of site investigation. 03/31/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 02/22/2024

Proposed date of completion of Remediation. 04/30/2024

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:

Landowner harvesting activities took longer into the fall than anticipated.

03/22/2024 - Discovery of historic spill or release during excavation of well head required additional remediation activities.

OPERATOR COMMENT

Mr. Allison has requested a report from our geologist concerning the potential for arsenic or other parameters reaching groundwater. Paul Stone of Stonegate Land & Water has been contracted to prepare this report but due to personal health issues during the last two weeks the report has not been completed. It will be completed and submitted as an attachment with the next Form 27 Supplemental for this well.

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

Signed: Randy Evans

Title: Wastewater Treatment ORC

Submit Date: _____

Email: Revans@Wellingtonoperating.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: 28548

COA Type**Description**

0 COA	

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**

403724130	CORRESPONDENCE
403724132	DISPOSAL MANIFESTS
403724133	DISPOSAL MANIFESTS
403724134	DISPOSAL MANIFESTS
403724137	DISPOSAL MANIFESTS
403724140	DISPOSAL MANIFESTS
403724142	DISPOSAL MANIFESTS
403724143	DISPOSAL MANIFESTS
403724144	DISPOSAL MANIFESTS
403724145	DISPOSAL MANIFESTS
403724146	DISPOSAL MANIFESTS
403724149	DISPOSAL MANIFESTS
403724152	DISPOSAL MANIFESTS
403724157	DISPOSAL MANIFESTS
403724158	DISPOSAL MANIFESTS
403724160	DISPOSAL MANIFESTS
403724162	DISPOSAL MANIFESTS
403724163	DISPOSAL MANIFESTS
403724165	DISPOSAL MANIFESTS
403724166	DISPOSAL MANIFESTS
403724167	DISPOSAL MANIFESTS
403724169	DISPOSAL MANIFESTS
403724173	DISPOSAL MANIFESTS
403724178	DISPOSAL MANIFESTS
403724180	DISPOSAL MANIFESTS

403724181	DISPOSAL MANIFESTS
403724182	DISPOSAL MANIFESTS
403724183	DISPOSAL MANIFESTS
403724185	ANALYTICAL RESULTS
403724186	ANALYTICAL RESULTS
403724197	MAP
403728379	CORRESPONDENCE

Total Attach: 32 Files

General Comments

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

Total: 0 comment(s)