

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403722773

Receive Date:

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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 Phone: (970) 567-6871 Mobile: (970) 567-6871
Address: 15301 DALLAS PKWY SUITE 900		
City: ADDISON State: TX Zip: 75001		
Contact Person: Cameron Gracey	Email: Graceyservices@msn.com	

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:**

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> E&P Waste       | <input checked="" type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water  | <input type="checkbox"/> Workover Fluids                        | _____                                  |
| <input 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 checked="" type="checkbox"/> Other (as described by EPA) | <u>Stained Soils if discovered</u>     |

**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**



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 \_\_\_\_\_ 410

E&P waste (solid) description   Soil containing Total TPH & Oil & Grease in excess of the Table 915 Limit \_\_\_\_\_

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 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**

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)