

State of Colorado
Energy & Carbon Management Commission

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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 ECOM 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>INDUSTRIAL GAS SERVICES INC</u>	Operator No: <u>42950</u>	Phone Numbers
Address: <u>5862 MCINTYRE COURT</u>		
City: <u>GOLDEN</u>	State: <u>CO</u>	Zip: <u>80403</u>
Contact Person: <u>Dennis Horner</u>	Email: <u>igsinc@att.net</u>	Phone: <u>(303) 594-6307</u>
		Mobile: <u>(303) 594-6307</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30276 Initial Form 27 Document #: 403418456

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: <u>WELL</u>	Facility ID: _____	API #: <u>123-05198</u>	County Name: <u>WELD</u>
Facility Name: <u>BEHRING 1</u>	Latitude: <u>40.440468</u>	Longitude: <u>-104.169325</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>35</u>	Twp: <u>6N</u>	Range: <u>61W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Rangeland
 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? No

Other Potential Receptors within 1/4 mile

No surface water within 1/4 of a mile.
No water wells within 1/4 of a mile.
Groundwater less than 20 ft is not expected at the disturbance location.
This location is within 2023 proposed HPH Mule Deer Sever Winter Range, Mule Deer Winter Concentration Area, and Pronghorn Winter Concentration. CPW consultation not required.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- E&P Waste** **Other E&P Waste** **Non-E&P Waste**
- Produced Water Workover Fluids No waste has been generated to date
- 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
Yes	SOILS	Wellhead	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.

This report is being provided in response to an email communication received on October 30, 2023 regarding reporting requirements and to update the ECMC that investigation activities are ongoing. Due to inaccessibility to the Site location, investigation and decommissioning activities were unable to be performed until October 2023. Site decommissioning including ancillary equipment removal and well head cutting and capping were performed in October 2023. Soil samples were collected from the sites of heater treater, tanks, flow lines, and well head, the results of which are provided in this Form 27-Supplemental report.

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):

Soil samples were collected from the sites of heater treater, tanks, flow lines, and well head, the results of which are provided in this Form 27-Supplemental report.

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 7
Number of soil samples exceeding 915-1 1
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 7600

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 3

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 _____

ND Highest concentration of Benzene (µg/l) _____
ND Highest concentration of Toluene (µg/l) _____
ND Highest concentration of Ethylbenzene (µg/l) _____
ND Highest concentration of Xylene (µg/l) _____
ND Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
1 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?

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?

Wellhead area was excavated by Civitas to do the cut & cap. Excavated E&P waste was taken off-site. Additional sampling of the sidewalls and floor of the excavated wellhead area will be performed by Civitas and reported by Civitas.

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.

E&P waste material excavated by Civitas has been transported off-site in accordance with Rules 905 and 906.

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.

Industrial Gas Services, Inc. (IGS) has exhausted all financial resources and cannot continue decommissioning activities. IGS has a Bond capacity of \$40,000, which is available to pay unpaid Behring #1 decommissioning invoices of \$17,257 and any additional decommissioning costs for the Behring #1 site.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Yes Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

If Yes: Estimated Volume (Cubic Yards) _____ 35
Name of Licensed Disposal Facility or ECMC Facility ID # _____ 150048
_____ 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.

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.

Industrial Gas Services, Inc. (IGS) has exhausted all financial resources and cannot continue decommissioning activities. IGS has a Bond capacity of \$40,000, which is available to pay unpaid Behring #1 decommissioning invoices of \$17,257 and any additional decommissioning costs for the Behring #1 site.

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. _____

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. 05/31/2023

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/01/2023

Proposed site investigation commencement. 07/01/2023

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/19/2023

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

Industrial Gas Services, Inc. (IGS) has exhausted all financial resources and cannot continue decommissioning activities. IGS has a Bond capacity of \$40,000, which is available to pay unpaid invoices of \$17,257 and any additional decommissioning costs for the Behring #1 site. IGS cannot locate alleged surface water or intermittent stream within 1/4 mile of the Behring #1 well site (see attached Google Earth image).

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

Signed: Dennis Horner

Title: Consultant

Submit Date: 02/10/2024

Email: igsinc@att.net

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: Krystal Heibel

Date: 05/21/2024

Remediation Project Number: 30276

COA Type**Description**

	Operator shall populate the "Actual Spill or Release date or date of discovery." information under the Implementation Schedule, in accordance with the spill/release's Form 19 submittal.
	Operator shall add Spill ID 485260 (after selecting "multiple facilities") and select Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912. in addition to the current selection, within the next submittal.
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
	If a spill/release of produced fluids or E&P waste causes an impact to soil, the operator should perform sampling and analysis to fully delineate the lateral and vertical extent of those impacts.
	Operator shall provide the analytical results within a table format within the next submittal.
5 COAs	

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**

403683080	FORM 27-SUPPLEMENTAL-SUBMITTED
403683256	MAP
403683257	ANALYTICAL RESULTS
403683258	ANALYTICAL RESULTS
403683259	ANALYTICAL RESULTS
403683260	MAP
403683330	PHOTO DOCUMENTATION
403683331	PHOTO DOCUMENTATION
403683332	PHOTO DOCUMENTATION
403683333	PHOTO DOCUMENTATION

Total Attach: 10 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	"Industrial Gas Services, Inc. (IGS) has exhausted all financial resources and cannot continue decommissioning activities. IGS has a Bond capacity of \$40,000, which is available to pay unpaid invoices of \$17,257 and any additional decommissioning costs for the Behring #1 site. IGS cannot locate alleged surface water or intermittent stream within 1/4 mile of the Behring #1 well site (see attached Google Earth image)."	05/21/2024

Total: 1 comment(s)