

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Receive Date:

05/29/2024

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 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: EVERGREEN NATURAL RESOURCES LLC	Operator No: 10705	Phone Numbers
Address: 1875 LAWRENCE ST STE 1150		Phone: (719) 2204330
City: DENVER	State: CO	Zip: 80202
Contact Person: Timothy Fernandez		Mobile: ()
Email: timothy.fernandez@enrllc.com		

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33551 Initial Form 27 Document #: 403583493

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: PIT	Facility ID: 265497	API #: _____	County Name: LAS ANIMAS
Facility Name: BANTINI 11-25 ONSITE		Latitude: 37.233476	Longitude: -104.737464
		** correct Lat/Long if needed: Latitude: _____	Longitude: _____
QtrQtr: NWNW	Sec: 25	Twp: 32S	Range: 66W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Non-Crop Land.
Fee

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

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)**DESCRIPTION OF IMPACT**

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	800 sq ft	On-Site Inspection, Soil Samples

INITIAL ACTION SUMMARY

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

ENR received CAs upon inspection of the Bantini 11-25 Pit Fac. ID: 265497 identifying that a Form 27 was never filed for the decommissioning of the pit. After investigating, ENR could not produce a historical Form 27 and was unable to find documentation that the pit was ever constructed. An inspection dated 8/7/2009 seems to indicate that this pit was reclaimed prior to 2009. Auger holes were drilled within the location of the pit at three locations. Soil samples were collected from the bottom of each hole. Edges of the pit were identified by digging auger holes.

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):

Four soil samples will be collected from the former site of the pit. Auger holes will be drilled in three areas within the pit to a depth of 4-5 feet. Soil samples will be analyzed for Metals, and Soil suitability for Reclamation. A sample from the center of the pit in the area of highest impact will be analyzed for full 915-1 analytes. A final sample will be collected from native, undisturbed ground and analyzed for Metals and Soil suitability for reclamation. The bottom of the pit was identified by drilling auger holes. The auger bit bottomed out on bedrock at all three soil sample sites, therefore we were able to confirm the following pit depths at the three sites: SS1- 4'5", SS2 - 4'10", SS3 - 4'8".

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 4
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 800

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 1
BTEX > 915-1 _____
Vertical Extent > 915-1 (in feet) 0

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 native sample was collected in native, undisturbed soil and analyzed for Table 915-1 Metals.

☐ 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.

Pit was reclaimed prior to 2009. No impacts have been identified at this time. If impacts are discovered via soil samples, soil will be removed from the pit and properly disposed of.

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.

Pit was reclaimed prior to 2009. No impacts have been identified at this time. If impacts are discovered via soil samples, soil will be removed from the pit and properly disposed of. The bottom of the pit was identified by drilling auger holes. The auger bit bottomed out on bedrock at all three soil sample sites, therefore we were able to confirm the following pit depths at the three sites: SS1 - 4'5", SS2 - 4'10", SS3 - 4'8". The Form 15 for this pit states that the pit was to be built to a size of 70ft x 30 ft x 6 ft deep. This has been determined to be inaccurate, as demonstrated by a historical photo of the pit from 2008 (attached:

Soil Remediation Summary

☒ In Situ

☐ Ex Situ

☐ No Bioremediation (or enhanced bioremediation)

☐ No Chemical oxidation

☐ No Air sparge / Soil vapor extraction

☐ Yes Natural Attenuation

☐ No Other _____

☐ _____ Excavate and offsite disposal

☐ If Yes: Estimated Volume (Cubic Yards) _____

☐ 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

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? 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

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? Yes

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.

Site of permitted pit has established 80% vegetation and no further reclamation is needed. Pit appears to have been reclaimed prior to 2009.

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. _____

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/02/2023

Proposed site investigation commencement. 11/03/2023

Proposed completion of site investigation. 04/24/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/01/2024

Proposed date of completion of Remediation. 04/24/2024

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:

OPERATOR COMMENT

This Form 27 is being submitted as a request for closure of the Bantini 11-25 pit remediation Project # 33551. The edges of the pit were identified, auger holes were drilled and samples were collected from the bottom of each hole. All sites are compliant with Table 915-1 standards.

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

Signed: Timothy Fernandez

Title: Regulatory Supervisor

Submit Date: 05/29/2024

Email: timothy.fernandez@enrllc.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: Chris Sanchez

Date: 06/13/2024

Remediation Project Number: 33551

COA Type**Description**

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**

403767864	FORM 27-SUPPLEMENTAL-SUBMITTED
403767931	ANALYTICAL RESULTS
403767932	ANALYTICAL RESULTS
403767955	SOIL SAMPLE LOCATION MAP
403767961	OTHER
403806027	PHOTO DOCUMENTATION

Total Attach: 6 Files

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

Environmental	Based on the information presented, it appears that no further remedial action is necessary at this time and the ECMC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.	06/13/2024
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Total: 1 comment(s)