

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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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) 402-0418 |
| City: ADDISON | State: TX | Zip: 75001 |
| Contact Person: Randy Evans | Email: Revans@Wellingtonoperating.com | Mobile: (970) 402-0148 |

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.

10/27/2024:

This information has been provided on the Form 19 I & S.

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.

October 27, 2024, moving forward:

Currently WOC proposes to resample the areas of the shallow sampling events in the areas of the East and West Wall sample locations. Small pots holes will be excavated, and samples will be collected based on field observations for staining, odors, and photo ionization (PID) readings. At least one additional sample will be collected and submitted from each pothole. The soil samples will be submitted for TPH analysis only C6 to C36 since this is the main parameter that exceeded the limit in these locations. Samples will be collected from the bottom and up to three sides of the pot hole since at least one side of each sample location has been backfilled with import soils.

As confirmation in the vicinity of the stockpile, WOC will resample these areas and submit the samples for TPH analysis C6 to C36.

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 18

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)

Highest concentration of SAR

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.

10/27/2024:
Due to size additional information is provided in the Attachment Sampling Narrative.

☐ 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.

10/27/2024:
Due to size additional information is provided in the Attachment Sampling Narrative.

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.

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.

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.

10/27/2024:
Due to size additional information is provided in the Attachment Sampling Narrative.

Soil Remediation Summary

| | |
|--|--|
| <input type="checkbox"/> In Situ | <input checked="" type="checkbox"/> Ex Situ |
| <input type="checkbox"/> Bioremediation (or enhanced bioremediation) | <input type="checkbox"/> Yes <input type="checkbox"/> Excavate and offsite disposal |
| <input type="checkbox"/> Chemical oxidation | <input type="checkbox"/> If Yes: Estimated Volume (Cubic Yards) <input type="text" value="410"/> |
| <input type="checkbox"/> Air sparge / Soil vapor extraction | <input type="checkbox"/> Name of Licensed Disposal Facility or ECMC Facility ID # <input type="text"/> |
| <input type="checkbox"/> Natural Attenuation | <input type="checkbox"/> Excavate and onsite remediation |
| <input type="checkbox"/> Other <input type="text"/> | <input type="checkbox"/> Land Treatment |
| | <input type="checkbox"/> Bioremediation (or enhanced bioremediation) |
| | <input type="checkbox"/> Chemical oxidation |
| | <input type="checkbox"/> Other <input type="text"/> |

Groundwater Remediation Summary

| |
|--|
| <input type="checkbox"/> No <input type="checkbox"/> Bioremediation (or enhanced bioremediation) |
| <input type="checkbox"/> No <input type="checkbox"/> Chemical oxidation |
| <input type="checkbox"/> No <input type="checkbox"/> Air sparge / Soil vapor extraction |
| <input type="checkbox"/> No <input type="checkbox"/> Natural Attenuation |
| <input type="checkbox"/> No <input type="checkbox"/> Other <input type="text"/> |

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 915-1 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 915-1 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. Additional soil samples need to be collected and analyzed for a couple of sample locations that the Table 915 limits were not met. This sampling is scheduled for Fall of 2024 due to surface owner use for crops and cattle. The excavation was completely backfilled and samples will be collected based on recorded coordinates. The site has been reclaimed into the agricultural activities,

10/27/2024:

Due to size additional information is provided in the Attachment Sampling Narrative.

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? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 11/11/2024

Proposed date of completion of Reclamation. 12/31/2024

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. 11/11/2024

Proposed date of completion of Remediation. 12/31/2024

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.

10/27/2024:

Due to size additional information is provided in the Attachment Sampling Narrative.

OPERATOR COMMENT

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 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

| | |
|-----------|--------------------------|
| 403952801 | CORRESPONDENCE |
| 403971460 | CORRESPONDENCE |
| 403971461 | ANALYTICAL RESULTS |
| 403971462 | ANALYTICAL RESULTS |
| 403971463 | ANALYTICAL RESULTS |
| 403971464 | ANALYTICAL RESULTS |
| 403971465 | ANALYTICAL RESULTS |
| 403971466 | SOIL SAMPLE LOCATION MAP |
| 403971474 | CORRESPONDENCE |

Total Attach: 9 Files

General Comments

User Group

Comment

Comment Date

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)