

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403890111  
Receive Date:  
08/15/2024  
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: <u>MURFIN DRILLING COMPANY INC</u>	Operator No: <u>61650</u>	Phone Numbers Phone: <u>(316) 858-8664</u> Mobile: <u>( )</u>
Address: <u>250 N WATER ST STE 300</u>		
City: <u>WICHITA</u>	State: <u>KS</u>	Zip: <u>67202</u>
Contact Person: <u>Cristina Goodrich</u>	Email: <u>cgoodrich@murfininc.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 21623 Initial Form 27 Document #: 402912170

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

Yes  Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>073-06757</u>	County Name: <u>LINCOLN</u>
Facility Name: <u>Moonraker 6-27</u>	Latitude: <u>39.150730</u>	Longitude: <u>-103.654100</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SENW</u>	Sec: <u>27</u>	Twp: <u>10S</u>	Range: <u>56W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>459718</u>	API #: _____	County Name: <u>LINCOLN</u>
Facility Name: <u>Moonraker 6-27</u>	Latitude: <u>39.150720</u>	Longitude: <u>-103.654100</u>	
** correct Lat/Long if needed: Latitude: <u>39.149740</u>		Longitude: <u>-103.659090</u>	
QtrQtr: <u>SENW</u>	Sec: <u>27</u>	Twp: <u>10S</u>	Range: <u>56W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: OFF-LOCATION FLOWLINE Facility ID: 481403 API #: \_\_\_\_\_ County Name: LINCOLN  
Facility Name: Production Line 6-27 Latitude: 39.149740 Longitude: -103.659090  
\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
QtrQtr: SENW Sec: 27 Twp: 10S Range: 56W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use crop land

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**

Dry Long Branch Creek, Aquatic Native Species Conservation Waters (dry), CR 22 25' W

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

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

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	GROUNDWATER	0	not encountered
No	SOILS	0	lab analysis

## INITIAL ACTION SUMMARY

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

Wellhead cut and cap assessments were completed at the Moonraker 6-27 2/3/23 and 3/9/23. Visual inspection and field screening of soils around the well and associated pumping equipment was conducted and grab soil sample (WH-B01@6') was submitted for laboratory analysis. The removal of the associated flowline was completed on February 3, 2023. Soil samples were collected from the locations where the flowline risers were disconnected at the wellhead (FL-B01@3') and separator (FL-B04@4'), from the directional change of the flowline (FL-B02@4'), and from the location where to flowline crossed Long Branch Creek (FL-B03@4') and submitted for laboratory analysis. Decommissioning activities were completed at the Moonraker 6-27 production facility on 2/3/23. Visual inspection and field screening of soils at one separator, one aboveground produced water tank, two aboveground storage tanks (AST), and two combustors was conducted following removal activities, and soil samples (SEP-B01@3", AST-B01@3", AST-B02@3", PW-B01@3", COM-B01@3", COM-B02@3") were submitted for laboratory analysis. Laboratory analytical results indicated that pH was elevated in the soil at the former produced water tank location, but within an acceptable range of analytical variability. Per discussion with Chris Sanchez, the site was revisited on 4/23/24 and all previous assessment soil sample locations were re-sampled and submitted to Origins Laboratory in Denver, Colorado for ECMC Table 915-1 PAH and Metals analysis to complete full Table 915-1 analysis. Additional background soil samples were also collected and submitted to Origins for Table 915-1 Metals analysis. All laboratory analytical results for TPH (C6-C36) and organic compounds of concern in soil were not detected above laboratory reporting limits, confirming there were no impacts to soil from oil and gas operations at the site. See attached site investigation report for all figures, tables, photos, and laboratory analytical reports.

## 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 ):

After harvest, additional background samples will be collected from the field around the former location at 4' bgs and analyzed for Arsenic. If additional background samples do not prove helpful, Murfin will move forward with excavation and confirmation sampling at FL-B04-1@4'. Murfin would like to request ECMC approval for Arsenic analysis only for confirmation soil samples from the FL-B04-1@4' excavation, should Murfin need to move forward with it.

### 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 22

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 1

### NA / ND

-- Highest concentration of TPH (mg/kg) 35.1

-- Highest concentration of SAR 5.4

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

### 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?

On 4/23/24, 6 grab background soil samples were collected from various locations and depths and submitted to Origins for Table 915-1 Metals analysis. On 6/25/24 2 additional background samples were collected near the county road from 4' bgs and submitted to Origins for Arsenic analysis only. The 6/25/24 Arsenic results were not helpful.

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?

See Proposed Sampling Plan

## 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.

Well has been plugged

### 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.

NA

### Soil Remediation Summary

**In Situ**

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

**Ex Situ**

- \_\_\_\_\_ 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.

Murfin is adequately bonded as shown by submitted Form 3A Doc: 403418364 and has General Liability insurance.

Operator anticipates the remaining cost for this project to be: \$ 2000 \_\_\_\_\_

## 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? 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? No \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

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.

The site was reclaimed and farmer is growing his crop for the season.

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). 02/03/2023

Proposed site investigation commencement. 02/03/2023

Proposed completion of site investigation. 11/30/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

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**

Form 6 document number 402972863 is related to this form.

Form 44 document number 402933830 is related to this form.

After harvest, additional background samples will be collected from the field around the former location at 4' bgs and analyzed for Arsenic. If additional background samples do not prove helpful, Murfin will move forward with excavation and confirmation sampling at FL-B04-1@4'. Murfin would like to request ECMC approval for Arsenic analysis only for confirmation soil samples from the FL-B04-1@4' excavation, should Murfin need to move forward with it.

This form is being submitted to satisfy the quarterly requirement per ECMC Rule 915.e.

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

Signed: David Castro

Title: Senior Project Scientist

Submit Date: 08/15/2024

Email: dcastro@eagle-enviro.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: 10/31/2024

Remediation Project Number: 21623

**COA Type****Description**

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**

403890111	FORM 27-SUPPLEMENTAL-SUBMITTED
403890113	SITE INVESTIGATION REPORT

Total Attach: 2 Files

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

Environmental	ECMC approves the Operators request for a reduced analyte list of Arsenic @ FL-B04-1@4' excavation.	10/31/2024
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Total: 1 comment(s)