

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

404011527

Receive Date:

12/02/2024

Report taken by:

KRIS NEIDEL

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: POC-I LLC	Operator No: 10386	Phone Numbers Phone: (307) 237-7854 Mobile: (307) 7466468
Address: P.O. BOX 51208		
City: CASPER State: WY Zip: 82605		
Contact Person: Rebecca Podio	Email: rpodio@gmail.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28244 Initial Form 27 Document #: 403272607

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: PIT	Facility ID: 116587	API #: _____	County Name: MOFFAT
Facility Name: ILES GATHERIN FACILITIES	Latitude: 40.307715	Longitude: -107.689715	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT	Facility ID: 116589	API #: _____	County Name: MOFFAT
Facility Name: ILES DOME SUNDANCE TANK BAT 2/PIT	Latitude: 40.307379	Longitude: -107.689185	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

Facility Type: PIT	Facility ID: 119213	API #:	County Name: MOFFAT
Facility Name: ILES DOME UNIT	Latitude: 40.307410	Longitude: -107.689390	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: CNW	Sec: 23	Twp: 4N	Range: 92W
	Meridian: 6	Sensitive Area? Yes	

SITE CONDITIONS

General soil type - USCS Classifications CL	Most Sensitive Adjacent Land Use Rangeland, Surface Water
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? Yes	

Other Potential Receptors within 1/4 mile

The site sits within 1/4 mile of the following the Colorado Parks and Wildlife High Priority Habitat. Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area, Elk Winter Concentration Area, Elk Severe Winter Range, Elk Migration Corridor, Aquatic Cutthroat Trout designated Crucial Habitat, Greater Sage Grouse General Habitat Management Area, Columbian Sharp-tailed Grouse Winter Range, Columbian Sharp-tailed Grouse Production Area, Greater Sage Grouse Priority Habitat Management Area, and Aquatic Native Species Conservation Waters

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	To be determined	Visual inspection and laboratory analysis
Yes	SURFACE WATER	To be determined	Visual inspection and laboratory 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.

Oil was initially discharged from the pit's discharge outfall (Facility ID 116589). Booms were placed, and areas with a sheen were recovered with a vacuum truck. Representatives of POC have walked the spill pathway to identify areas of impact. No impacted vegetation was observed. Impacted soils and water will be remediated to below-appropriate standards.

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):

Pre-sampling will occur in both the large pit and the two smaller pits to identify the extent of the contamination. Sampling will also determine when both areas have met the standards required by ECMC and other regulators.

Proposed Groundwater Sampling

- ☐ Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Ongoing groundwater monitoring at the location is to be completed under Remediation Project #8398

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 0

Number of soil samples exceeding 915-1

NA / ND

-- Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR

Was the areal and vertical extent of soil contamination delineated? No

BTEX > 915-1 No

Approximate areal extent (square feet)

Vertical Extent > 915-1 (in feet)

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l)

Depth to groundwater (below ground surface, in feet)

Highest concentration of Ethylbenzene (µg/l)

Number of groundwater monitoring wells installed

Highest concentration of Xylene (µg/l)

Number of groundwater samples exceeding 915-1

Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 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?

Site investigation will continue throughout the remediation process. The first further site investigation will occur throughout the pre-sampling portion of this plan.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

This plan is specifically for the remediation of the pits.

Division Strategy: Divide the pit into 6-8 quadrants, allowing for focused and efficient cleanup efforts. Physical barriers will be erected to prevent cross-contamination. The layout of the divisions will be determined by the pit's physical features and the information gained from the pre-sampling work.

Operational Approach: Heavy machinery will be utilized for excavation and material handling, significantly minimizing worker direct exposure to contaminants. All operations will adhere to strict safety protocols, with personnel equipped with necessary personal protective equipment (PPE) and receiving task-specific training.

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.

Executive Summary

This document presents a strategic plan for remediation of hydrocarbon contamination at the Large Discharge Pit (Facility ID 116587) at the Ilse Dome Tank Battery, emphasizing adherence to environmental standards, regulatory compliance, and safety and efficiency. It outlines a comprehensive approach to address contaminants, primarily focusing on hydrocarbons due to black oil carryover, with a commitment to environmental compliance and returning the Ilse Dome Field to production.

Project Overview

The objective is to remediate hydrocarbon contamination, facilitating the safe and productive reuse of the Ilse Dome Field. The plan spans from May 1, 2024, to July 1, 2024, within a timeline that accommodates environmental and operational considerations to minimize adverse impacts.

Contaminant Focus and Remediation Strategy

- Primary Contaminants: Hydrocarbons, specifically Total Petroleum Hydrocarbons (TPH), identified from black oil in production water.
- Sampling and Analysis: Pre-remediation will involve 20 - 80 sample holes along the bottom and sides of the pit to determine the contamination extent, focusing initially on visual indicators of contamination. Samples will also be sent to a lab during this stage to determine the extent and depth of the contamination. This sampling will lead to an analysis that will help with better planning and timing estimates of future work on the pit.
- Regulatory Compliance: All activities will conform to ECMC rules and regulations, timing stipulations from CPW, and any other applicable regulatory rules while ensuring environmental safety and compliance.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 1000

_____ Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID # _____

_____ Natural Attenuation

_____ Excavate and onsite remediation

_____ Other _____

_____ 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 Soil Results

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: \$ 250000

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?

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 site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules with an approved Colorado Parks and Wildlife seed mix after completion of remediation.

Is the described reclamation complete? _____

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. _____

Actual Spill or Release date, or date of discovery. 06/28/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/28/2022

Proposed site investigation commencement. 03/31/2023

Proposed completion of site investigation. 07/28/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/31/2023

Proposed date of completion of Remediation. 08/01/2024

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

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

Signed: Rebecca Podio

Title: Petroleum Engineer

Submit Date: 12/02/2024

Email: rpodio@gmail.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: KRIS NEIDEL

Date: 01/31/2025

Remediation Project Number: 28244

COA Type**Description**

	<p>Operator anticipates the remaining cost for this project to be: \$250,000.</p> <p>Within 30-days of Staff approval of F27 Doc #404011527, Operator to provide a detailed task and cost breakdown for the \$250,000</p>
	<p>Operator shall comply with all outstanding COAs on previously submitted and approved Form 27.</p>
	<p>Operator shall provide the analytical results of all samples collected in a tabular format including: the locations and depths of the samples, date and time samples were collected and comparison to Table 915-1. Operator shall provide a diagram of where the samples were collected.</p> <p>If samples were collected during separate sampling events, the Operator shall provide each of the laboratory reports as separate attachments.</p>
	<p>It is stated, " The field pumper has also been instructed to take all possible measures to secure the wells and field for winter. "</p> <p>Ensure that all valves are physically locked in the appropriate position to prevent any creep or unintended opening of the valves.</p>
	<p>As a part of daily logs and planning, the operator shall include observations of the former discharge area, in particular the status of water seeping into the gulch.</p>
	<p>Provide notice to Environmental staff, Kris Neidel (kris.neidel@state.co.us) or 970-846-5097 72hrs prior to all sampling events on this project.</p>
	<p>It is stated that netting and winterizing the pit will occur.</p> <p>Notify ECMC of the completion of these task on a supplemental Form 27, quarterly update.</p>
	<p>It appears that a total of 610 bbls of water and 10 bbls of oil has been removed from the surface of the pit.</p> <p>Operator shall provide final disposition of the liquid waste on a supplemental Form 27, quarterly update.</p>
	<p>It is stated, "Colorado Parks and Wildlife (CPW) has granted permission for continued work..."</p> <p>Operator shall provide copy of communication with CPW on a supplemental Form 27, quarterly update.</p>
	<p>It is stated, "The cleanup operations have been planned and are being executed in clearly defined phases."</p> <p>ECMC is not aware of the plan or phases. Operator shall submit a detailed plan outlining the phases on a supplemental form 27 quarterly update.</p>
	<p>Operator's remediation schedule is obsolete. Operator shall provide a revised remediation schedule.</p>

11 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.

<u>Att Doc Num</u>	<u>Name</u>
404011527	FORM 27-SUPPLEMENTAL-SUBMITTED
404012686	REMEDIATION PROGRESS REPORT
404012687	PHOTO DOCUMENTATION

Total Attach: 3 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	It is stated, "Documentation of these activities is a key component of the project." ECMC agrees.	12/09/2024

Total: 1 comment(s)