

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

404043853

Receive Date:

01/23/2025

Report taken by:

Alexander Ahmadian

## Site Investigation and Remediation Workplan (Initial 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: BEHRENS RESOURCES INC	Operator No: 10695	Phone Numbers
Address: PO BOX 188		Phone: (303) 894-2100
City: DEER TRAIL	State: CO Zip: 80135	Mobile: (303) 905-5341
Contact Person: James Hix - East OWP EPS	Email: james.hix@state.co.us	

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 38841 Initial Form 27 Document #: 404043853

## 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: Decommissioning Tank Battery (Facility ID #487063)/Ownership Change from Texas Tea (87195)

## SITE INFORMATION

Yes Multiple Facilities

Facility Type: PIT	Facility ID: 114195	API #:	County Name: ADAMS
Facility Name: BLICK FARMS 1-6	Latitude: 40.000512	Longitude: -104.361064	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENE	Sec: 6	Twp: 1S	Range: 62W Meridian: 6 Sensitive Area? No

  

Facility Type: LOCATION	Facility ID: 320123	API #:	County Name: ADAMS
Facility Name: BLICK-FARMS-61S62W 6NENE (OWP)	Latitude: 39.998861	Longitude: -104.361385	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENE	Sec: 6	Twp: 1S	Range: 62W Meridian: 6 Sensitive Area? No

Facility Type: OFF-LOCATION FLOWLINE		Facility ID: 475495	API #:	County Name: ADAMS	
Facility Name: Wellhead Line 6NENE		Latitude: 40.000575		Longitude: -104.361461	
** correct Lat/Long if needed: Latitude:      Longitude:					
QtrQtr: NENE	Sec: 6	Twp: 1S	Range: 62W	Meridian: 6	Sensitive Area? No

  

Facility Type: TANK BATTERY		Facility ID: 487063	API #:	County Name: ADAMS	
Facility Name: Blick-Farms 1-6 Tank Battery (OWP)		Latitude: 40.000508		Longitude: -104.361380	
** correct Lat/Long if needed: Latitude:      Longitude:					
QtrQtr: NENE	Sec: 6	Twp: 1S	Range: 62W	Meridian: 6	Sensitive Area? No

## SITE CONDITIONS

General soil type - USCS Classifications ML      Most Sensitive Adjacent Land Use Cropland

Is domestic water well within 1/4 mile? No      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

There are no DWR Permitted water wells plotted within 1/4-mile of the Location. DWR Permit #41736- Receipt #9003699 Domestic (1970) [DTW = 94-105 ft bgs, SWL = 63 ft bgs, Top of Perf Casing = 82 ft bgs, TD = 140 ft bgs, ~5150 ft SSE]; DWR Permit #329875- Receipt #10025824 Domestic (1963) [Log\_GW = 458-467 ft, DTW = 170 ft bgs, Top of Perf Casing = 403 ft bgs, TD = 550 ft bgs, ~6010 ft NE]; Surface Water: Henrylyn Canal (Abandoned) ~150 ft West, Unnamed, intermittent tributary drainage to Long Valley/Lost Creek, ~1900 ft East, NWI Mapped Wetlands - Riverine (Henrylyn Canal - Abandoned) ~150 ft West; and Unnamed intermittent drainage ~1900 ft East. No CPW Mapped HPH w/in 1/4-mile. No residential building units (RBU) w/in 1/4-mile of the Location.

# 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
UNDETERMINED	SOILS	UNKNOWN	VISUALLY, FIELD SCREENING, 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 oil and gas Location is in the Colorado Energy and Carbon Management Commission (ECMC) Orphaned Well Program (OWP). This initial Form 27 is submitted for site investigation activities performed during decommissioning of Oil and Gas Facilities, specifically sampling activities beneath aboveground storage tanks (AST), Pit, Separators, and Flowline risers. Field screening will be performed beneath equipment and of the four sidewalls and base of excavations to investigate for evidence of E&P Waste impacts. At a minimum, soil samples will be submitted to an accredited environmental laboratory for analysis of Table 915-1 parameters from the excavation sidewall soils that exhibit E&P Waste impact; or from the expected downgradient sidewall in the absence of E&P Waste impact; and from the base of the excavation. Soil samples will be collected and analyzed in accordance with Colorado ECMC 900 Series Rules.

## 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 ):

Grab soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 parameters including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds [metals (As, Ba, Cd, Cu, Cr6+, Pb, Ni, Ag, Zn) and soil suitability for reclamation parameters (pH, EC, SAR, hot water soluble boron)].

### Proposed Groundwater Sampling

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

Groundwater samples are not expected to be collected as part of this investigation due to estimated groundwater depth. If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

### Proposed Surface Water Sampling

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

Surface water samples are not expected to be collected as part of this investigation.

## Additional Investigative Actions

☐ Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

No additional alternative investigative actions are expected to be conducted as part of this site investigation.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 0

Number of soil samples exceeding 915-1

Was the areal and vertical extent of soil contamination delineated?

Approximate areal extent (square feet)

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1

Vertical Extent > 915-1 (in feet)

#### 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?

☐ 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

#### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

If E&P Waste impacts are encountered during decommissioning of Oil and Gas Facilities, approximately 10 cubic yards of impacted soils will be excavated, temporarily stockpiled on location, and hauled to a commercial disposal facility.

#### REMEDIAL 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.

If E&P Waste impacted soils are encountered, approximately 10 cubic yards of the soils will be excavated and removed. If the horizontal and vertical extent of the E&P Waste impacts cannot be defined or removed during this initial action, then additional site investigation and remediation will be performed at a later date under an approved supplemental Form 27. Site data will be evaluated and remediation technologies implemented to meet Table 915-1 soil residential screening levels, protection of groundwater screening levels, or Table 915-1 groundwater and WQCC Regulation 41 numeric and narrative levels as applicable to site conditions.

#### Soil Remediation Summary

☐ In Situ

☐ Ex Situ

Bioremediation ( or enhanced bioremediation )

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards)

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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

A Form 27 Supplemental will be submitted within 90 days from receipt of results.

#### ☐ 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.

The former BEHRENS RESOURCES - BLICK-FARMS #1-6 (OWP) well, Flowlines, remote Tank Battery, and former Pit are in the ECMC Orphaned Well Program. The former Operator's bond and other funding will be used to plug and abandon (PA) the well, and investigate, remediate, and reclaim these oil and gas facilities.

Operator anticipates the remaining cost for this project to be: \$ 125490

### WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? \_\_\_\_\_

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: \_\_\_\_\_

# 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 Colorado ECMC OWP will prepare a reclamation plan to reclaim this oil and gas location/facilities in accordance with 1000 Series Rules including grading/recontouring of disturbed areas. The reclamation plan will be implemented under a separate scope of work. Final reclamation will be conducted per ECMC 1000 Series Rules and prioritized based on OWP ranking, project funding, and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

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. \_\_\_\_\_

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/16/2024

Proposed site investigation commencement. 02/03/2025

Proposed completion of site investigation. 02/28/2025

## 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**

The former BEHRENS RESOURCES INC - 10695 BLICK-FARMS #1-6 (OWP) oil and gas well (API #05-001-08148) BLICK-FARMS-61S62W6NENE (Location ID #320123), Pit #114195, Off-Location Flowline (Facility ID #475495), Blick-Farms 1-6 Tank Battery (Facility #487063) and Process Piping (Facility #475496) are in the ECMC Orphaned Well Program ("OWP"). The OWP will oversee oil and gas facility decommissioning activities. This Form 27 Initial presents the site investigation and remediation workplan for soil sampling activities conducted concurrently with the decommissioning of the off-location flowlines, tank battery, and to investigate the 20 ft by 20 ft by 10 ft pit with unknown status. This Form 27 Initial also presents a Change of Operator for the Blick-Farms 1-6 Tank Battery (Facility ID #487063) from Texas Tea of Colorado LLC DBA Texas Tea LLC - 87195 to Behrens Resources Inc. - 10695 which are both in the ECMC OWP. Soils will be assessed for evidence of E&P Waste impacts and field screened. Soil samples collected from areas where E&P Waste impacts are the most likely including, but not limited to, beneath the aboveground storage tanks (AST), produced water vault (PWV), separator, flowline risers, Pit #114195, and areas of staining. Soil samples will be submitted to an accredited environmental laboratory for analysis of full Table 915-1 parameters. Site specific background soil samples will be collected from undisturbed areas and submitted for analysis of Table 915-1 metals and soil suitability for reclamation parameters. Flowline trenches will be observed for evidence of spills/releases. At a minimum soil samples will be collected beneath flowline risers, fittings, or where there is evidence of E&P Waste impacts submitted for laboratory analysis. A Form 27 Supplemental will be submitted within 90 days from the date results are received.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 01/23/2025

Email: james.hix@state.co.us

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: Alexander Ahmadian

Date: 02/10/2025

Remediation Project Number: 38841

**COA Type****Description**

	Location is adjacent to a jurisdictional Wetlands as mapped on the National Wetland Inventory Maps. In the event that operations encroach upon the wetlands, Operator shall consult with the US Army Corps of Engineers regarding compliance with Sections 401 and 404 of the Clean Water Act. Operator shall submit all communications/permits obtained to the ECMC via Form 4 Sundry. Note: Approval of this Form 27 does not supersede any Federal, State or Local regulations.
1 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**

404043853	INVESTIGATION/REMEDIATION WORKPLAN (INITIAL)
404043965	MAP
404043968	SITE MAP
404088117	FORM 27-INITIAL-SUBMITTED

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)