

**State of Colorado  
Energy & Carbon Management Commission**

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Document Number:

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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: SCOUT ENERGY MANAGEMENT LLC | Operator No: 10779                | Phone Numbers          |
| Address: 13800 MONTFORT DRIVE SUITE 100       |                                   | Phone: (970) 902-0518  |
| City: DALLAS                                  | State: TX                         | Zip: 75240             |
| Contact Person: Cody Christian                | Email: cody.christian@scoutep.com | Mobile: (970) 902-0518 |

**PROJECT, PURPOSE & SITE INFORMATION****PROJECT INFORMATION**

Remediation Project #: 18536 Initial Form 27 Document #: 402641269

**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: SPILL OR RELEASE    | Facility ID: 461701 | API #: _____                                   | County Name: RIO BLANCO |
| Facility Name: Levison 34X Lateral |                     | Latitude: 40.106910                            | Longitude: -108.820180  |
|                                    |                     | ** correct Lat/Long if needed: Latitude: _____ | Longitude: _____        |
| QtrQtr: SWSW                       | Sec: 26             | Twp: 2N  | Range: 102W             |
| Meridian: 6                        | Sensitive Area? No  |  |                         |

**SITE CONDITIONS**

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use Non Crop Land

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**

The nearest "surface water" is an unnamed dry ephemeral drainage approximately 260 feet to the south of the spill origin.

## 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          | 1237ft. x 7ft. x 0.5 ft            | Field determined with tape measure |
| Yes       | VEGETATION     | Minor distressed vegetation noted. | 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.

Injection lateral line failure, releasing produced water to land and ultimately reached an unnamed dry surface water of the state and one of our siphon locations. Operations isolated block valves to stop the leak. Vac truck picked up available liquids, clean up going to continue as soon as snow removal is completed-large snowstorm overnight 2/5-2/6 has affected water wash process. Type of pipe, size, and release point depth below grade unknown as of this time due to adverse weather conditions. Will provide further details in the supplemental report. A soil sample location map and preliminary analytical results are included as an attachment.

### 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 ):

Preliminary soil samples were collected on May 7, 2019 from the spill path. A total of five (5) grab samples analyzed for TPH (GRO/DRO), BTEX, SAR, EC and pH were collected at a depths from 0 to 6 inches below ground surface (ft-bgs). Results show elevated SAR EC, and pH levels within the impacted area. Subsequent soil samples analyzed for SAR at SS1-SS4 sample locations, EC at SS1 sample location and pH at SS2 and SS3 sample locations will be collected during the summer of 2021 to monitor natural attenuation. SAR, EC and pH impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized.

#### 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 16

Number of soil samples exceeding 915-1 10

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

Approximate areal extent (square feet) 8659

**NA / ND**

-- Highest concentration of TPH (mg/kg) 224

-- Highest concentration of SAR 49

BTEX &gt; 915-1 No

Vertical Extent &gt; 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 background sample was collected from an undisturbed area adjacent to the spill. Additionally, two historical backgrounds from nearby past releases were also used as part of this investigation. Results may be found in the attached analytical results.

☐ 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.

No soil is intended for removal.

**REMEDATION 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.

SAR, EC, HSB and pH impacted soils will be treated in-situ by Natural Attenuation. After initial water wash seasonal precipitation events will be utilized. Subsequent soil samples will be collected to monitor natural attenuation.

**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  
Yes \_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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 REM Progress Rpt.

### 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 policies described below afford industry standard terms and conditions for said policy types, noting that Scout's pollution coverage is broadened pollution legal liability which does not dictate cover based on gradual pollution or sudden or accidental pollution losses. The coverage is intended to respond if a loss occurs during the policy period as respects to a particular property (owned, leased, operated). Note that all layers of excess coverage shown act in excess of the general liability policy, and note that only the Lead \$10M Umbrella Policy is afforded in excess of pollution coverage.

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

### 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: \_\_\_\_\_

## 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.

Site will be reclaimed and seeded once repairs are completed.

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. 02/06/2019

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 05/07/2019

Proposed site investigation commencement. \_\_\_\_\_

Proposed completion of site investigation. 05/07/2019

### **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**

Preliminary soil samples were collected from the spill path on May 7, 2019. These samples were summarized in the Initial Form 27 (Doc #402641269).

Subsequent soil samples were collected on June 17, 2021. All four original sample locations were sampled and analyzed for Table 910-1 metals, PAHs and inorganics. Per the COA four (4) new locations were added in the siphon, between SS3 and SS4, and between SS2 and SS3. These locations were sampled and analyzed for full Table 910-1 parameters. Results indicated exceedances to Table 910-1 standards above local background levels of SAR (SS1, SS2, SS3, SS5, SS6, SS7 and SS8), EC (SS1 and SS8) and pH (SS3 and SS5).

The spill was allowed to naturally attenuate and all eight (8) locations were sampled on September 5, 2024 for past overages as well as analytical parameter gaps between Table 910-1 and Table 915-1. Results indicate the only current exceedances to Table 915-1 standards above local background levels are SAR (SS3 and SS8), pH (SS3 and SS5) and HSB (SS1).

Hexavalent chromium sample results were below the laboratory Reported Detection Limit (RDL) of 1.0 and 1.2 mg/kg in all samples. Consideration of Table 915-1 footnote 9 is requested for hexavalent chromium samples.

Scout requests a reduced analyte list on all future samples consisting of SAR at SS3 and SS8, pH at SS3 and SS5, and HSB at SS1 only.

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

Signed: Cody Christian

Title: HSE Coordinator I

Submit Date: \_\_\_\_\_

Email: cody.christian@scoutep.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: 18536

### **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**

|           |                    |
|-----------|--------------------|
| 404090405 | ANALYTICAL RESULTS |
|-----------|--------------------|

Total Attach: 1 Files

## **General Comments**

### **User Group**

### **Comment**

### **Comment Date**

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

Total: 0 comment(s)