

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

404132400

Receive Date:

04/25/2025

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 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: ROBERT L BAYLESS PRODUCER LLC	Operator No: 6720	Phone Numbers
Address: 707 17TH STREET SUITE 2975		Phone: (505) 564-7801
City: DENVER	State: CO	Zip: 80202
Contact Person: Helen Trujillo		Mobile: (505) 330-2593
Email: notices@rlbayless.com		

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 30484 Initial Form 27 Document #: 403436324

## 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: Rule 911. Closure of oil and gas facilities

## SITE INFORMATION

Yes Multiple Facilities

Facility Type: PIT	Facility ID: 117433	API #:	County Name: ROUTT
Facility Name: EITLES-BRADLEY 1-14	Latitude: 40.482962	Longitude: -107.110704	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENE	Sec: 14	Twp: 6N	Range: 87W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL	Facility ID:	API #: 107-06142	County Name: ROUTT
Facility Name: EILTS-BRADLEY 1-14	Latitude: 40.482740	Longitude: -107.111020	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NENE	Sec: 14	Twp: 6N	Range: 87W Meridian: 6 Sensitive Area? Yes

Facility Type:	LOCATION	Facility ID:	316765	API #:		County Name:	ROUTT
Facility Name:		ELTS-BRADLEY-66N87W 14NENE		Latitude:	40.482651	Longitude:	-107.111035
				** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr:	NENE	Sec:	14	Twp:	6N	Range:	87W
				Meridian:	6	Sensitive Area?	Yes

## SITE CONDITIONS

General soil type - USCS Classifications	SM	Most Sensitive Adjacent Land Use	location on private ranch
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

Yampa River is approximately 762 feet to the northwest directly downhill of the wellsite.

## 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	UNDETERMINED	Soil Sampling

### INITIAL ACTION SUMMARY

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

Please refer to the Energy Carbon and Management Commission (ECMC) Document Numbers (DN) 403794171 and 403956047 for initial facility plug and abandonment activities, decommissioning, and other activities completed. Please reference Remediation Project Number (RPN) 30484 for activities completed to date associated with this project.

### 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 ):

RL Bayless plans to advance up to 14 investigative soil borings within and surrounding the former wellhead, tank battery, and production pit footprints to vertically and laterally define previously reported impacts. One soil boring will be advanced at each of the centers of the historic wellhead and tank battery footprints, and three will be advanced in each cardinal direction of the tank battery and wellhead footprints. One boring will be advanced east between the production well and west tank battery footprints, bringing the total soil boring locations for the tank battery and wellhead footprints to nine. One soil boring will be advanced in the upgradient production pit location, and four more soil borings will be advanced in each cardinal direction of the production pit location, bringing the total soil boring locations for the production pit footprint to five (5). The proposed boring locations can be referenced in the attached Figure 1. Continued on "Operator Comments" section.

#### Proposed Groundwater Sampling

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

Encountering groundwater is not anticipated at this time. If at any point in this remediation process groundwater is encountered, it will be sampled for Table 915-1 constituents, reported, and the project parameters will be reevaluated to incorporate groundwater considerations.

#### 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 ):

Please see the "Proposed Soil Sampling" and "Operator Comments" Sections for these details.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 0

Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 0

Highest concentration of SAR

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

BTEX > 915-1 No

Approximate areal extent (square feet) 32500

Vertical Extent > 915-1 (in feet) 4

#### 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

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?

In accordance with ECOM Rule 915e.(2)D., three background samples were collected from nearby off-pad locations, one background was taken approximately 125 feet southwest of the tank battery footprint, one background was taken approximately 75 feet south of the tank battery footprint, and one background was taken approximately 50 feet south of the production pit footprint. The sampling information can be referenced in DN 403794171.

☐ 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?

Please see the "Proposed Soil Sampling" and "Operator Comments" sections for these details.

### 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.

The sources (production equipment) have since been removed.

#### 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.

Once soil boring, soil sampling, and delineation activities of Elites Bradley 1-14 Site is achieved a remediation plan will be presented to the ECOM.

#### 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 ECOM Facility ID #

Natural Attenuation

Excavate and onsite remediation

Other \_\_\_\_\_

Land Treatment

Bioremediation (or enhanced bioremediation)

Chemical oxidation

Other \_\_\_\_\_

### **Groundwater Remediation Summary**

No \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

No \_\_\_\_\_ Chemical oxidation

No \_\_\_\_\_ Air sparge / Soil vapor extraction

No \_\_\_\_\_ Natural Attenuation

No \_\_\_\_\_ 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 Delineation of historic impacts - facility closure

### 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's general liability insurance is provided by Berkley National Insurance Company, Certificate # 971124807, Doc# 2415276  
For financial assurance, please see approved Form 3A, Doc# 403504554

Operator anticipates the remaining cost for this project to be: \$ 60000

### 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.

Reclamation Plan was proposed in submittal of Form 27 Doc# 403550560. The reclamation will proceed only after resolution of REM# 30484. Any excavation occurring during remediation will be backfilled

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? \_\_\_\_\_

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. 08/04/2025

Proposed date of completion of Reclamation. 08/25/2025

## 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). 07/05/2023

Proposed site investigation commencement. 06/26/2023

Proposed completion of site investigation. 06/16/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/25/2025

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

Continued from "Proposed Soil Sampling" section.

Investigative borings will be advanced using an environmental drill rig equipped with solid stem auger and ODEX drill tooling capabilities to collect and field screen discrete intervals as each boring is advanced. Discrete confirmation samples will be collected using a California Sampler (split spoon) for field screening purposes at each 5-foot interval. Two discrete soil samples will be submitted from each boring location, the most impacted based on field screening and the boring terminus. Investigative soil borings will be advanced to 5-feet beyond observed impacts. Boring advancement will be started at the base of the wellhead and tank battery footprints due to those areas estimated to have the greatest impacted soils from previous sampling. Boring advancement will start at the upgradient location at the historic production pit due to that area having the highest estimated impacts from previous sampling. Data from those two initial borings will provide an estimate on the depth of the impact for the wellhead and tank battery footprints. All borings are anticipated to be advanced to minimum total depths of 20 feet bgs. The proposed boring locations are depicted in the attached Figure 1.

Additionally, RL Bayless requests that RPN 30484 be evaluated under ECMC Residential Soil Screening Level Concentrations (RSSLCs) in accordance with ECMC Rule Table 915-1, Footnote 7, due to the following reason provided below that indicate there is no pathway for communication to groundwater associated with the Elits Bradley 1-14 (Site) location (Facility ID: 117433).

1) The nearest sensitive receptor (Unnamed) which is located 490 feet East of the Site. The Site is situated at an elevation of approximately 6,760 feet above mean sea level (amsl), the water source rests at an elevation of approximately 6,500, feet amsl. The elevation difference between these two locations is approximately 260 feet. Based on this depth to groundwater at the Site is estimated to be greater than 260 feet.

Prior to additional investigative drilling and sampling, in accordance with ECMC Rule 915e.(2)C., RL Bayless requests the Director for approval of a proposed reduced analyte suite of total petroleum hydrocarbons (TPH), pH, and hexavalent chromium.

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

Signed: Dustin Held

Title: Division Manager

Submit Date: 04/25/2025

Email: dheld@hrlcomp.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: 05/23/2025

Remediation Project Number: 30484

## COA Type

## Description

	It is understood that the proposed activity will attempt to delineate the known impacts, a subsequent Form 27 will present these results and propose a remediation method.
	Request for amended sample is approved as follows; samples shall be for Table 915-1 concentrations of TPH, BTEX, PAH and inorganics, Chrom IV and arsenic
	Residential Soil Screening levels are acceptable at this time. However, if a pathway to groundwater is discovered, ECMC may amend Table 915-1 requirements at any time.
	Additional background samples for Arsenic shall be collected from: appropriate areas, similar soil types and depths to the pad confirmation samples.  Additional analytes may be required and added as the operator determines necessary.
4 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.

## Att Doc Num

## Name

404132400	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404134558	MAP
404216336	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

## General Comments

## User Group

## Comment

## Comment Date

Environmental	Preliminary samples were collected on 8/3/2023. The following areas had exceedances of Table 915-1 for TPH: Tank, wellhead and Pit. Arsenic concentrations on the pad were higher than background. Pit had an exceedance of pH.	05/23/2025
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Total: 1 comment(s)