

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Jason Kosola

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: <u>GUNNISON ENERGY LLC</u>	Operator No: <u>10515</u>	Phone Numbers Phone: <u>(303) 296-8807</u> Mobile: <u>()</u>
Address: <u>999 18TH STREET SUITE 1755N</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Tyson Johnston</u>	Email: <u>tyson.johnston@oxbow.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 24644 Initial Form 27 Document #: 403124166

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: Q4 2024 - Status Update - Administratively Close Open Pit Facility IDs (100431 and 115194).

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>100431</u>	API #: _____	County Name: <u>GUNNISON</u>
Facility Name: <u>RIVIERA FED 11-90-7</u>	Latitude: <u>39.119847</u>	Longitude: <u>-107.482224</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>7</u>	Twp: <u>11S</u>	Range: <u>90W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>PIT</u>	Facility ID: <u>115194</u>	API #: _____	County Name: <u>GUNNISON</u>
Facility Name: <u>FEDERAL 7-11-90</u>	Latitude: <u>39.119847</u>	Longitude: <u>-107.482224</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>7</u>	Twp: <u>11S</u>	Range: <u>90W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Rangeland-
National Forest

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? Yes

Other Potential Receptors within 1/4 mile

Little Henderson Creek of the North Fork draw is approximately 220 feet from 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) Historic Blowdown Open Pit Facility IDs (100431 and 115194)

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	~80x80	Site Investigation/Laboratory Analytical
Yes	SOILS	65x65x20	Site Investigation/Laboratory 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.

Please refer to the State of Colorado Energy and Carbon Management Commission (ECMC) Document Numbers (DNs) 403193909 and 403527386 for initial and subsequent investigative activities completed prior to July 1, 2024. All investigative activities that occurred prior to July 1, 2024 can be referenced under Remediation Project Number (RPN) 24644.

On October 22, 2024, Gunnison performed quarterly groundwater monitoring activities at the Site. These activities included: fluid level gauging in all 3 monitoring wells, purging of monitoring wells MW-01, MW-02, and MW-03. Depth to groundwater ranged from 17.10 in MW-02 and 19.94 in MW-01. All groundwater measurements were collected from the top of casing (TOC) of the well. A groundwater sample was not collected from MW-03 as this location had insufficient water to collect a sample. Groundwater samples were submitted to Pace Analytical of Mt. Juliet, Tennessee for laboratory analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX), 1,2,4 – trimethylbenzene, 1,3,5 – trimethylbenzene, naphthalene, chloride, sulfate, and total dissolved solids (TDS).

Please see the attached report of work completed (ROWC) summarizing the quarterly groundwater sampling activities completed during the fourth quarter (4Q) of 2024.

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):

Gunnison Energy LLC (GE) is in the process of determining a remediation approach to address the soil impacts. Once a remediation plan has been confirmed with the United States Forest Service (USFS), Bureau of Land Management (BLM), and GE, the plan will be presented to the ECMC. Vertical and lateral delineation of the soil and groundwater impacts associated with the historic blowdown pit has been confirmed. Based on the latest subsurface investigation completed in 2023 and 2024, there are approximately 2,143 cubic yards of impacted soil to be remediated at the Site (DN 403527386). The approximate area of impacted soils is illustrated on Figures 2 and 3 of the document attached to ECMC DN 4033879334.

All future soil samples will be analyzed for a reduced suite of arsenic, barium, benzene, toluene, ethylbenzene, and total xylenes (BTEX), total petroleum hydrocarbons (TPH) 1,2,4-TMB, 1,3,5-TMB, 1-methylnaphthalene, 2-methylnaphthalene, and naphthalene (DN 403879334).

Proposed Groundwater Sampling

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

GE will continue to gauge and sample all groundwater monitoring wells on a quarterly basis as Site access allows.

All future groundwater samples will be analyzed for a reduced suite of BTEX, 1,2,4-TMB, 1,3,5-TMB, and naphthalene (DN 403879334).

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):

See "Proposed Soil Sampling" and "Proposed Groundwater Sampling" sections above.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 0
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 3000

NA / ND

-- Highest concentration of TPH (mg/kg) _____
NA Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 25

Groundwater

Number of groundwater samples collected 2
Was extent of groundwater contaminated delineated? Yes
Depth to groundwater (below ground surface, in feet) 16
Number of groundwater monitoring wells installed 3
Number of groundwater samples exceeding 915-1 0

ND Highest concentration of Benzene (µg/l) _____
ND Highest concentration of Toluene (µg/l) _____
ND Highest concentration of Ethylbenzene (µg/l) _____
ND Highest concentration of Xylene (µg/l) _____
NA 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?

Please see ECMC DNs 403193909, 403527386, and 403879334 for previously collected site-specific background soil sample details and results per ECMC Rule 915.e.(2).D.

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 Soil Sampling" and "Proposed Groundwater Sampling" sections above.

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.

Impacts are fully delineated, GE is currently evaluating remedial options to remove the source (former blowdown pit) which will be presented at a later date.

REMEDICATION 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.

GE is in the process of determining a remediation approach to address the soil impacts associated with the historic blowdown pit. Once a remediation plan has been confirmed with the United States Forest Service (USFS), Bureau of Land Management (BLM), and GE, the plan will then be presented to the ECMC. Vertical and lateral delineation of the soil impacts associated with the historic blowdown pit has been completed as verified by analytical data (DN 403527386). There are approximately 2,1423 cubic yards of impacted soil to be remediated at the Site. The approximate area of impacted soils is illustrated on Figures 2 and 3 of the document attached to ECMC DN 4033879334.

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.

GE plans to install a minimum of one additional groundwater monitoring well within the footprint of the historic pit location once the impacted soils have been removed and remediated. This will confirm the removal of the source impacts. GE will continue to gauge and sample the three existing groundwater monitoring wells outside the pit footprint on a quarterly basis as Site access allows.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other 4Q 2024 Status Update to RPN 24644

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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, Gunnison Energy has general liability insurance in the amount of \$2M, and Gunnison Energy has umbrella insurance, which sits over the general liability insurance in the amount of \$10M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$12M.

Operator anticipates the remaining cost for this project to be: \$ 100000

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.

The location has been through final reclamation.

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). 08/22/2022

Proposed site investigation commencement. 07/10/2023

Proposed completion of site investigation. 07/02/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/02/2025

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

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

Signed: Parker Coit, P.G

Title: Lead Consultant Geologist

Submit Date: 03/04/2025

Email: parkercoit@wsp.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: Jason Kosola

Date: 06/02/2025

Remediation Project Number: 24644

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**

404065482	FORM 27-SUPPLEMENTAL-SUBMITTED
404115772	MONITORING REPORT
404115773	ANALYTICAL RESULTS

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)