

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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03/17/2025

Report taken by:

Krystal Heibel

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: SCHNEIDER ENERGY SERVICES INC	Operator No: 76840	Phone Numbers Phone: (970) 8679437 Mobile: ()
Address: P O BOX 889		
City: FORT MORGAN	State: CO Zip: 80701	
Contact Person: Jeff Schneider	Email: jeff@schneiderenergy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 18482 Initial Form 27 Document #: 402716182

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: 102699	API #: _____	County Name: MORGAN
Facility Name: REGGIE 1	Latitude: 40.172711	Longitude: -103.796370	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 6	Twp: 2N	Range: 57W Meridian: 6 Sensitive Area? No

Facility Type: WELL	Facility ID: _____	API #: 087-05905	County Name: MORGAN
Facility Name: REGGIE 1	Latitude: 40.172464	Longitude: -103.799242	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 6	Twp: 2N	Range: 57W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION		Facility ID: 313815	API #:	County Name: MORGAN	
Facility Name: REGGIE-62N57W 6NWNE		Latitude: 40.172422		Longitude: -103.799359	
** correct Lat/Long if needed: Latitude: Longitude:					
QtrQtr: NWNE	Sec: 6	Twp: 2N	Range: 57W	Meridian: 6	Sensitive Area? No

Facility Type: SPILL OR RELEASE		Facility ID: 482766	API #:	County Name: MORGAN	
Facility Name: Reggie #1		Latitude: 40.173018		Longitude: -103.796356	
** correct Lat/Long if needed: Latitude: Longitude:					
QtrQtr: NWNE	Sec: 6	Twp: 2N	Range: 57W	Meridian: 6	Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications CL	Most Sensitive Adjacent Land Use Cropland; Residential
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? No	

Other Potential Receptors within 1/4 mile

Badger Creek located ~120 feet West of location.
According to USFWS, Freshwater Emergent Wetland 170 feet SW of wellhead, Freshwater Pond 240 feet East of Tank Battery/Pits
WW#0457328 located 670 feet North, indicates depth to groundwater ~120 feet
NRCS soil type at wellhead: Olney Sandy Loam, Terrace, 0 to 1 percent slope, Map Unit Symbol OsA
NRCS soil type at Tank Battery: Truckton Soils, 3 to 9 percent slopes, Map Unit Symbol TvC

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	GROUNDWATER	NA	Lab Analysis if encountered
Yes	SOILS	Unknown	Lab 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.

On 10/15/2021 1 soil sample was collected from the Reggie WH and analyzed for Organics & SSR. Results were in compliance with Table 915-1. Field screening using a PID was conducted on all four side walls of the WH. Readings were not indicative of contaminants. Operator requests no further sampling at the wellhead.

On 6/30/2022 soil samples were collected from the former pit skim tank, separator pothole, and above-ground storage tank (AST); samples were analyzed for organics and SSR. Results indicate elevated levels of SSR at the Tank Battery (TB-SS-01 @ 6", TB-SS-02 @ 6", TB-SS-04 @ 6"), Skim Tank (ST-FS-01 @ 4', ST-SS-03 @ 2'), Separator (SEP-01 @ 3' & TB-SS-03 @ 2'), and Produced Water Pits (PIT-N, PIT-S, PIT-E, PIT-W) @ 3". There were no TPH exceedances.

Schneider is requesting that a reduced sampling plan be approved for SSR, TPH & Arsenic only.

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):

At the pit, full berm removal and proper disposal of all soils. Confirmation sampling on the sidewalls and floors for SSR, TPH & Arsenic.
At the separator, excavation and removal of contaminated soils. Sidewalls and floor samples will be collected & analyzed for SSR, TPH & Arsenic.
At the tank battery, excavation and disposal of contaminated soils. Sidewall and floor samples will be collected & analyzed for SSR, TPH & Arsenic.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site assessment, a grab groundwater sample will be collected and analyzed for all organic compounds per COGCC Table 915-1.

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):

Two additional background samples will be taken near the pit and tank batteries. They will be sampled at relevant depths and analyzed for SSR & Arsenic.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 21
Number of soil samples exceeding 915-1 11
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 0

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 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?

1 background sample was taken on 10/15/2021 and analyzed for SSR.
Two additional background samples will be taken near the pit and tank batteries. They will be sampled at relevant depths and analyzed for SSR & Arsenic.

☐ 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?

At the pit, full berm removal and proper disposal of all soils. Confirmation sampling on the sidewalls and floors for SSR, TPH & Arsenic.
At the separator, excavation and removal of contaminated soils. Sidewalls and floor samples will be collected & analyzed for SSR, TPH & Arsenic.
At the tank battery, excavation and disposal of contaminated soils. Sidewall and floor samples will be collected & analyzed for SSR, TPH & Arsenic.
Two additional background samples will be taken near the pit and tank batteries. They will be sampled at relevant depths and analyzed for SSR & Arsenic.

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.

To date, no source removal has been conducted. Source removal will be conducted via excavation and hauling off of contaminated soils to Pawnee Waste. Manifests will be provided to ECMC in subsequent reports.
Confirmation sampling will be conducted to confirm lateral and vertical extent of source removal.

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.

6/30/2022 sample results indicate elevated levels of SSR at the Tank Battery (TB-SS-01 @ 6", TB-SS-02 @ 6", TB-SS-04 @ 6"), Skim Tank (ST-FS-01 @ 4', ST-SS-03 @ 2'), Separator (SEP-01 @ 3' & TB-SS-03 @ 2'), and Produced Water Pits (PIT-N, PIT-S, PIT-E, PIT-W) @3". There are no TPH exceedances.
Excavation will occur at the pit, separator and tank batteries. Sidewall and floor confirmation samples will be taken and analyzed for SSR, TPH & Arsenic.

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.

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

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.

Schneider Energy Services Inc has complied with General Liability Insurance requirements per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation.

Operator anticipates the remaining cost for this project to be: \$ 50000

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.

Reclamation will be in accordance with COGCC 1000 Series Rules.

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. 05/01/2026

Proposed date of completion of Reclamation. 05/01/2028

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. 07/19/2022

Actual Spill or Release date, or date of discovery. 07/19/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 06/28/2021

Proposed site investigation commencement. 04/15/2025

Proposed completion of site investigation. 05/01/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/19/2022

Proposed date of completion of Remediation. 05/01/2026

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

During a January 2025 remediation audit, it was determined that the remediation for the Reggie #1 location was not completed. The oversight was caused by a change in field consultants. A Form 27S (Doc No. 404087650) was filed on 2/11/2025, stating that this is the Q1 2025 quarterly report filing for REM #18482.

This Document was denied by ECMC on 3/5/2025, stating, "The Laboratory Analytical PDF attached to this form indicates it has been altered after lab delivery. ECMC has not conducted a complete technical review of this form, data, or attachments but is denying this form."

Schneider has obtained secured copies of the reports, directly from Origins Lab, which are attached to this report.

Schneider commits to a quarterly reporting schedule for the remainder of this project.

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

Signed: Mackenzie Smith

Title: Staff Engineer

Submit Date: 03/17/2025

Email: msmith@ardorenvironmental.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: Krystal Heibel

Date: 07/09/2025

Remediation Project Number: 18482

COA Type**Description**

	Operator shall indicate the plans for the off-location flowlines: abandon in place or remove.
	Further site investigation is needed. Operator shall conduct a closure investigation in accordance with Rule 911.c. Pit Closure Guidance Document.
	If a spill/release of produced fluids or E&P waste causes an impact to soil, the operator should perform sampling and analysis to fully delineate the lateral and vertical extent of those impacts. Operator shall fully vertically and horizontally delineate all impacts. Once that is established, ECMC will review the Operator's request for a reduced analyte suite. At this time, full Table 915-1 shall be sampled and analyzed for each sampling location. "Confirmation sampling will be conducted to confirm lateral and vertical extent of source removal."
	Either provide an explanation as to why the full Table 915-1 analyses were not tested on the soil samples; or, the operator will need to collect confirmation soil samples as described in the Rule 915.e.(2). Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
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**

404122944	FORM 27-SUPPLEMENTAL-SUBMITTED
404123096	ANALYTICAL RESULTS
404123097	ANALYTICAL RESULTS
404123098	ANALYTICAL RESULTS
404123153	SITE INVESTIGATION REPORT

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)