FORM 27 Rev 5/22

State of Colorado
Oil and Gas Conservation Commission

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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 COGCC 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 INFORMATON

Name of Operator: GULFPORT ENERGY CORPORATION Operator No: 10339
Address: 713 MARKET DRIVE
City: OKLAHOMA CITY State: OK Zip: 73114
Contact Person: Jace Marshall Email: jmarshall@gulfportenergy.com

Phone Numbers
Phone: (405) 252-4637
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25558 Initial Form 27 Document #: 403199346

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.
- [X] Other: Flare Pit

SITE INFORMATION

No Multiple Facilities

Facility Type: PIT Facility ID: 481584 API #: County Name: MOFFAT
Facility Name: Ridgeview 32-16-1 Flare Pit Latitude: 40.475666 Longitude: -107.610544
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NESW Sec: 16 Twp: 6n Range: 91w Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications: SC
Most Sensitive Adjacent Land Use: Unused agriculture land and wildlife along with livestock.
Is surface water within 1/4 mile?

Is domestic water well within 1/4 mile? Yes Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Water well permit number 33422-F is located approximately 1800-ft west to the southwest from the wellhead. An irrigation canal/stream is located approximately 750-west of the wellhead. Johnson Gulch (Freshwater Emergent Wetland) is an ephemeral stream area that flows into the Yampa River approximately 1040-ft east and 840-ft north of the wellhead.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [ ] **E&P Waste**
- [ ] Produced Water
- [ ] Oil
- [ ] Condensate
- [ ] Drilling Fluids
- [ ] Drill Cuttings
- [X] **Other E&P Waste**
- [ ] Workover Fluids
- [ ] Tank Bottoms
- [ ] Pigging Waste
- [ ] Rig Wash
- [ ] Spent Filters
- [X] Pit Bottoms
- [ ] Other (as described by EPA)
- [ ] **Non-E&P Waste**

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	TBD	Excavation, field-screening, drilling

INITIAL ACTION SUMMARY

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

Impacts will be assessed per rules 911

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Yes, based upon discovery of impacted soil. Soil samples will be collected from the bottom hole and sidewalls (cardinal directions) from the flare pit. All samples will be analyzed for the complete list of contaminants of concern as outlined in COGCC Table 915-1. At least one background sample will be collected from an adjacent, upgradient or cross-gradient, unaffected area. The background sample will be analyzed for EC, SAR, pH, boron, metals, and chloride.

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: 4

Number of soil samples exceeeding 915-1: 0

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

Approximate areal extent (square feet): 846

NA / ND

-- Highest concentration of TPH (mg/kg): 83.87

-- Highest concentration of SAR: 11

BTEX > 915-1: No

Vertical Extent > 915-1 (in feet): 20

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:

NA Highest concentration of Benzene (µg/l):

NA Highest concentration of Toluene (µg/l):

NA Highest concentration of Ethylbenzene (µg/l):

NA 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?

A background sample was collected southeast of the pad location in undisturbed soil. The sample was analyzed for EC, SAR, pH, Boron, and 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?

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.

Impacted soils from the source area was removed with heavy excavation equipment to penetrate through a sandstone layer encountered at 16-20 feet below ground surface. Waste manifest for disposal at the Moffett County Landfill are provided in Attachment E.

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.

TPH impacts were observed in confirmation samples collected on 8/3/2022 from the excavation bottom, on top of a sandstone layer at approximately 16 bgs at the pit bottom and also on the east sidewall. On 11/15, a direct push rig was contracted to delineate the outside perimeter of the pit to determine if impacts were observed horizontally on the sandstone layer. All samples were below Table 915-1 regulatory limits. The pit was re-excavated on 5/22-23 to encompass the former flare pit area and the residual impacts observed on 8/3/22. Excavated materials were screened with olfactory and visual observations, probing using an electrical conductivity (EC) meter, and Photoionization Detector (PID). Upon reaching the sandstone layer contaminated soils are observed and excavated impacted materials were segregated from fill materials. When the extent of contamination materials were delineation and impacts removed, which was determined through soil screening via EC and PID meters, 4 confirmation samples were collected at the pit bottom and east side where previous impacts were observed. All confirmation soil samples were analyzed for all COGCC Table 915-1 organic constituents, and all were below regulatory limits. A background sample was collected in the adjacent undisturbed landscape southeast of the pit location at ~ 10 feet bgs where refusal was reached with a Giddings rig.

Soil Remediation Summary

☐ **In Situ**

- ____ Bioremediation (or enhanced bioremediation)
- ____ Chemical oxidation
- ____ Air sparge / Soil vapor extraction
- ____ Natural Attenuation
- ____ Other ____

☒ **Ex Situ**

- Yes Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) 25
  - Name of Licensed Disposal Facility or COGCC 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.

NA

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 Soil

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.

Gulfport Energy has a general liability insurance coverage of $2-million.

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

WASTE DISPOSAL INFORMATION

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

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards 262

E&P waste (solid) description Hydrocarbon impacted soils

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Moffat County Landfill

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? Yes

Is additional groundwater monitoring to be conducted?

Operator shall comply with the COGCC 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 will be developed and submitted upon approval.

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. 10/01/2023

Proposed date of completion of Reclamation. 10/31/2023

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. 08/05/2021

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/05/2021

Proposed site investigation commencement. 04/27/2022

Proposed completion of site investigation. 05/23/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/27/2022

Proposed date of completion of Remediation. 06/06/2023

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

Gulfport respectfully requests closure of remediation project # 25558.

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

Signed: Joel Mason Title: Agent

Submit Date: 06/08/2023 Email: joel.mason@absarokasolutions.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: KRIS NEIDEL Date: 06/09/2023

Remediation Project Number: 25558

COA Type	Description
	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required at the site.
1 COA	

Attachment Check 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
403426661	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403428457	SOIL SAMPLE LOCATION MAP
403428458	OTHER
403428459	ANALYTICAL RESULTS
403428460	ANALYTICAL RESULTS
403428461	DISPOSAL MANIFESTS
403429632	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
Environmental	It appears that: The DPT sampled identified the lateral extent of contamination, the 8/3/22 sampled quantified the magnitude of contamination, 5/23/23 samples demonstrated that the vertical extent of impact was removed.	06/09/2023
Environmental	Arsenic concentrations are similar to those of background concentrations, per data provided.	06/09/2023

Total: 2 comment(s)