

State of Colorado Energy & Carbon Management Commission

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Document Number:

403437337

Receive Date:

06/19/2023

Report taken by:

Chris Sanchez

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 INFORMATION

Name of Operator: MULL DRILLING COMPANY INC	Operator No: 61250	Phone Numbers Phone: (316) 2646366 Mobile: (316) 3649203
Address: 1700 N WATERFRONT PKWY B#1200		
City: WICHITA	State: KS Zip: 67206-6637	
Contact Person: James Beilman	Email: jbeilman@mulldrilling.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27405 Initial Form 27 Document #: 403296219

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: Well Abandonment

SITE INFORMATION

No Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 017-07135	County Name: CHEYENNE
Facility Name: NW ARAPAHOE UNIT 24		Latitude: 38.870290	Longitude: -102.162690
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 6	Twp: 14S	Range: 42W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM
 Most Sensitive Adjacent Land Use Cropland
 Is domestic water well within 1/4 mile? No
 Is surface water within 1/4 mile? No
 Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Cropland

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
No	SOILS	minimal	Sampling 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.

Investigation of area indicated no Impacts

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):

Please look to attached Investigation report to determine analytical methods and locations for sampling.

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

NA

Proposed Surface Water Sampling☐ Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

NA

Additional Investigative Actions☐ Additional alternative investigative actions described in attached Site Investigation Plan (summary):

No additional investigation needed.

SITE INVESTIGATION REPORT**SAMPLE SUMMARY**

Soil

NA / ND

Number of soil samples collected 5

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 100

-- Highest concentration of TPH (mg/kg) 30.6

-- Highest concentration of SAR 1.63

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) 100

Number of groundwater monitoring wells installed 0

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)

ND Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 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?

Background samples were collected. Please see attached letter report for characters and types.

☐ 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 source needs to be removed. Table 915-1 indicated a a slightly elevated pH in one sample location. This will be processes with reclamation/cultivation processes.

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.

No source needs to be removed. Table 915-1 indicated a a slightly elevated pH in one sample location. This will be processes with reclamation/cultivation processes.

Soil Remediation Summary

☐ In Situ

☐ Ex Situ

Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 0

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID #

_____ Natural Attenuation
_____ Other _____

_____ Excavate and onsite remediation
_____ 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.

No Groundwater Impacts.

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 Investigation/Remediation Progress

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.

Financial Assurance #403205814; Initial cost estimate assumes initial investigation sampling

Operator anticipates the remaining cost for this project to be: \$ 0

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

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

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? 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? No

Does the previous reply indicate consideration of background concentrations?

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 shall occur at this location as appropriate: In this case the location is being returned to cropland. Crop should be planted by fall 2023

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 08/31/2023

Proposed date of completion of Reclamation. 12/31/2024

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). 01/19/2023

Proposed site investigation commencement. 04/30/2023

Proposed completion of site investigation. 08/01/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 08/02/2023

Proposed date of completion of Remediation. 08/31/2023

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

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

Signed: James Beilman

Title: Director, Safety & Enviro

Submit Date: 06/19/2023

Email: jbeilman@mulldrilling.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: Chris Sanchez

Date: 07/26/2023

Remediation Project Number: 27405

COA Type**Description**

	The pH of soil samples collected at the site exceeds the allowable level for Table 915-1 soil suitability for reclamation for pH and exceeds the background sample presented. Therefore, Operator will define the extent of soil with elevated pH, and if Operator proposes to leave soil with elevated pH in place, Operator will submit a Reclamation plan pursuant to Rule 915.b.
Final Reclamation	ECMC has changed final closure request to no due to exceedance of PH in soils, PH must be corrected prior to approval of final closure request. Soil Samples must meet all 915-1 standards prior to closure.
Final Reclamation	Control noxious weeds throughout the reclamation process. All areas being reclaimed shall be kept as free as practicable of all undesirable plant species designated to be noxious weeds. Weed control measures shall be conducted in compliance with the Colorado Noxious Weed Act, C.R.S. §35-5.5-115 and the current rules pertaining to the administration and enforcement of the Colorado Noxious Weed Act. It is recommended that the operator consult with the local weed control agency or other weed control authority when weed infestation occurs. It is the responsibility of the operator to monitor affected and reclaimed lands for noxious weed infestations. If applicable, the Director may require a weed control plan.
3 COAs	

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**

403437337	FORM 27-SUPPLEMENTAL-SUBMITTED
403437341	ANALYTICAL RESULTS
403437342	REMEDIATION PROGRESS REPORT
403437343	OTHER

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)