FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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Document Number: 403515497
Receive Date:
Report taken by:

Site Investigation and Remediation Workplan (Initial 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: GORDON ENGINEERING INC Operator No: 34720
Address: PO BOX 113
City: SPRINGDALE State: UT Zip: 84767
Contact Person: John Gordon Email: johngordon1gordon@yahoo.com

Phone Numbers
Phone: (970) 618-0811
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #:
Initial Form 27 Document #: 403515497

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.
- [X] Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- [ ] Rule 913.g: Changes of Operator.
- [X] Rule 915.b: Request to leave elevated inorganics in situ.
- [ ] Other:

SITE INFORMATION

No Multiple Facilities

Facility Type: WELL Facility ID: API #: 103-08264 County Name: RIO BLANCO
Facility Name: FEDERAL 9-3 Latitude: 39.894417 Longitude: -108.732394
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NWNE Sec: 9 Twp: 2S Range: 101W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications: ML
Most Sensitive Adjacent Land Use: Cattle grazing (General sagebrush-steppe flora).
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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [ ] **E&P Waste**
- [X] **Other E&P Waste**
- [ ] **Non-E&P Waste**

- [ ] Produced Water
- [ ] Workover Fluids
- [ ] Oil
- [X] 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	~200' squared	Visual inspection.

INITIAL ACTION SUMMARY

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

The site was visited for initial investigation of site conditions and collection of soil samples from under the well pad and two tanks. Soil sampling was conducted as outlined below and in accordance with Rule 915.

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):

One grab soil sample was taken from each disturbed site (where each tank was as well as the well pad). PID readings were taken from each site in one-foot increments to a depth of five feet, with the greatest reading being the increment taken as the sample. These were then sent in for analysis for all analytes corresponding to the COGCC table 915-1 regulatory standards.

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: 3
Number of soil samples exceeeding 915-1: 2
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet): 0

NA / ND

ND — Highest concentration of TPH (mg/kg)
-- — Highest concentration of SAR: 8.01
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

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?

[X] Were background samples collected as part of this site investigation?

Yes, two background grab samples were collected within 25m of the site on undisturbed land; their collection followed the same protocol as the soil samples taken on the impacted sites. BKGD 1 was taken on the same plane (elevation) as the impacted sites, whereas BKGD 2 was taken upslope of the impacted areas to minimize likelihood of cross contamination via migration.

[ ] 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

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

No removal necessary. Equipment has 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.

Background samples show that the pH and arsenic levels exceeding the 915-1 regulatory standards are similar to those within the surrounding environment, so the operator is requesting an exemption following Table 915-1: Footnote 10. Electrical conductivity at the "West 1" site is in exceedance; SAR is also in exceedance with regulatory standards and background readings at "West 1" and "Tank 2". These measures will most likely be remedied by natural attenuation as plant root exudates free up sodium ions adsorbed to soil particles, so Gordon Engineering is requesting an exemption following Table 915-1: Footnote 10.

Soil Remediation Summary

[X] **In Situ** [ ] **Ex Situ**

No	Bioremediation (or enhanced bioremediation)		Excavate and offsite disposal
No	Chemical oxidation		If Yes: Estimated Volume (Cubic Yards)
No	Air sparge / Soil vapor extraction		Name of Licensed Disposal Facility or COGCC Facility ID #
Yes	Natural Attenuation		Excavate and onsite remediation
No	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

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 is financially capable of addressing any necessary costs.

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

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:

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.

Final reclamation will be performed in accordance with the 1000 series rules once all soil samples show concentrations less than the Table 915-1 standard. Gordon Engineering will reseed the location with a seed mix approved by the surface owner (the Bureau of Land Management) during the fall, with vegetative cover reassessed in the spring of 2024. If noxious weeds are on site, pesticides will be sprayed to control their populations until native flora has vigorously established themselves.

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. 09/20/2023

Proposed date of completion of Reclamation. 10/15/2023

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.

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date).

Proposed site investigation commencement. 07/27/2023

Proposed completion of site investigation.

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/20/2023

Proposed date of completion of Remediation. 10/15/2023

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

This Initial Form 27 is being submitted to outline the site remediation plan for the closure of the Gordon Engineering Fed 9-3 facility. The initial investigation efforts and analytical results have been included in this document as well as a map of the site. Background samples show that the inorganic contaminant levels are within the ranges of the surrounding environment, with the exceptions being SAR and EC. However, because the SAR and EC are not within saline or sodic soil ranges and the surrounding environment is a sagebrush-steppe (which is largely comprised of halophytic flora), natural attenuation is suggested for the remediation of these inorganics.

Note: On the map, "West 1" refers to the first tank, while "East 1" refers to the well pad.

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

Signed: John Gordon Title: Operator

Submit Date: Email: johngordon1gordon@yahoo.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: Date:

Remediation Project Number:

COA Type	Description
0 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
403516081	MAP
403516085	ANALYTICAL RESULTS
403516956	ANALYTICAL RESULTS

Total Attach: 3 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)