

# State of Colorado Energy & Carbon Management Commission

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Document Number:

403534985

Receive Date:

10/30/2023

Report taken by:

Krystal Heibel

## 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 INFORMATION

Name of Operator: <u>STRACHAN EXPLORATION INC</u>	Operator No: <u>83130</u>	<b>Phone Numbers</b>
Address: <u>383 INVERNESS PKWY, STE 360</u>		
City: <u>ENGLEWOOD</u> State: <u>CO</u> Zip: <u>80112</u>		
Contact Person: <u>Jason Harms</u>	Email: <u>jason@strachanexploration.com</u>	
		Phone: <u>(303) 330-1921</u>
		Mobile: <u>( )</u>

### PROJECT, PURPOSE & SITE INFORMATION

#### PROJECT INFORMATION

Remediation Project #: 32359 Initial Form 27 Document #: 403534985

#### 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: <u>WELL</u>	Facility ID: _____	API #: <u>123-21739</u>	County Name: <u>WELD</u>
Facility Name: <u>FRANK 35-7</u>	Latitude: <u>40.619130</u>	Longitude: <u>-104.056450</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>35</u>	Twp: <u>8N</u>	Range: <u>60W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>332033</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>FRANK-68N60W 35SWNE</u>	Latitude: <u>40.619130</u>	Longitude: <u>-104.056450</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>35</u>	Twp: <u>8N</u>	Range: <u>60W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: OFF-LOCATION FLOWLINE	Facility ID: 468566	API #:	County Name: WELD
Facility Name: Wellhead Line	Latitude: 40.611865	Longitude: -104.052627	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SESE	Sec: 35	Twp: 8N	Range: 60W
Meridian: 6		Sensitive Area? No	

## **SITE CONDITIONS**

General soil type - USCS Classifications MH Most Sensitive Adjacent Land Use Rangeland

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**

Area is within 2022 Effective Density Habitat for Pronghorn Winter Concentration

Closest Domestic Well within quarter mile – None  
Additional Water Wells – Household Use 1,815' east

Nearest Surface Water - None

Nearest Occupied Building – None

Additional Occupied Buildings – None

Freshwater Emergent Wetland – 3,000' N

No other potential receptors are located within 1/4 mile of the Site

Above distances are approximations

Additional Flowline Receptors:

None

# 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	SOILS	No known impacts	Investigation Pending

## INITIAL ACTION SUMMARY

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

In accordance with COGCC Rule 911, this form serves as notification for the decommissioning and abandonment of the Frank 35-7 wellhead. Plugging operations were completed the week of September 26, to facilitate an offset operators frac program. The ground and sub-surfaces will be visually inspected for hydrocarbon impacts during equipment decommissioning. Field observations and photo documentation will be recorded in a field inspection form for submittal to the COGCC.

## 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 ):

Soil samples will be collected from the surface in cardinal directions of the wellhead, as defined in Rule 911.a.(4) guidance document (9/20/21), for field screening purposes. Discrete soil samples will be collected for laboratory analysis either in any area of observed hydrocarbon impacts, or adjacent to the cut and capped wellhead and below the wellhead flowline riser. Soil samples will be submitted to an accredited laboratory for analysis of TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation. See the attached Figure 1 for an illustration of the wellhead and proposed soil sample locations.

### Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of Table 915-1 Groundwater Inorganic Parameters and Organic Compounds in Groundwater.

### 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 ):

Strachan Exploration Inc will abandon in place the related wellhead flowline (approximately 2,860 feet long) with landowner agreement. The flowline will be abandoned in place with third party observations in accordance with 1105 Series Rules. During flowline closure, soil samples will be collected for field screening approximately every 250 feet along the flowline path. Soil samples collected from areas most likely to have been impacted during operation of the flowline, such as flowline risers, will be submitted for laboratory analysis of full Table 915-1 constituents. If indications of soil impacts are noted during field-screening, the sample(s) will be submitted to an accredited laboratory for the above analysis. A Form 44 will be submitted notifying of flowline removal activities within the required timeframe. See the attached Figure 1 for an illustration of the flowline alignment and proposed soil sample locations.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected \_\_\_\_\_ 0

Number of soil samples exceeding 915-1 \_\_\_\_\_

Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_

Approximate areal extent (square feet) \_\_\_\_\_

\_\_\_\_\_ Highest concentration of TPH (mg/kg) \_\_\_\_\_

\_\_\_\_\_ Highest concentration of SAR \_\_\_\_\_

BTEX > 915-1 \_\_\_\_\_

Vertical Extent > 915-1 (in feet) \_\_\_\_\_

#### 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?

☐ 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.

If a suspected release is identified through soil screening and/or laboratory analysis, soils may be removed and transported to a licensed disposal facility. If all source material cannot be removed during excavation activities, alternative plans will be proposed in subsequent Form 27 supplemental.

### 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.

If reportable soil impacts, as defined in Rule 912.b., are discovered, a site-specific remediation plan will be developed and submitted via a Supplemental Form 27. If reportable impacts are not encountered, a Supplemental Form 27 closure request will be submitted within 90 days of abandonment and/or decommissioning activities.

### Soil Remediation Summary

☐ In Situ

☐ Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

\_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and offsite disposal

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_

\_\_\_\_\_ Name of Licensed Disposal Facility or COGCC Facility ID # \_\_\_\_\_

\_\_\_\_\_ Excavate and onsite remediation

Other \_\_\_\_\_

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.

Operator does not have site-specific financial assurance for this project; however, Operator has surface, plugging, and gas facility bonding including Surety IDs 20170089, 20170088, 20160134, 20160133 and 20150065, as well as commercial general liability and/or umbrella/excess insurance meeting the requirements of Rule 705.b.

Costs included herein are estimates only and may change over time based on numerous factors. Accordingly, Operator makes no guarantees as to the accuracy of such cost estimates, thus providing an estimate for the next year below.

Operator anticipates the remaining cost for this project to be: \$ 8000

### 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.

Following completion of investigation or remediation activities, the location will be backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with the COGCC 1000 series.

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. 10/18/2023

Proposed date of completion of Reclamation. 06/18/2024

## 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. 09/29/2023

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

## SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/29/2023

Proposed site investigation commencement. \_\_\_\_\_

Proposed completion of site investigation. \_\_\_\_\_

## REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

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**

This Form 27 serves as notification for the decommissioning of the Frank 35-7 wellhead. Plugging operations were completed in September 2023. Wellhead cut and cap activities are planned to begin in November 2023 following approval of this Form 27 Initial. This schedule may be adjusted due to unforeseen circumstances, delays, and/or changes in weather. The related tank battery (Location ID: 468559) and associated facilities will also be decommissioned and will be reported under a separate Remediation Project.

The Frank 35-7 Wellhead Line appears to have been registered with an incorrect alignment by previous operator based on aerial imagery showing a surface disturbance indicative of a flowline running directly from the wellhead to the separator. The suspected correct alignment is displayed with proposed sample points in Figure 1. The exact flowline alignment will be verified with subsurface utility locating, and the registered flowline alignment and soil sampling and field-screening scope will be adjusted as necessary.

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

Signed: Ryan Finley

Title: Senior Project Geologist

Submit Date: 10/30/2023

Email: rfinley@entradainc.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: Krystal Heibel

Date: 11/02/2023

Remediation Project Number: 32359

**COA Type****Description**

	Operator will submit a Form 44 Pre-abandonment notice pursuant to Rule 1105.d. A Form 44 will be filed prior to starting flowline abandonment, and will be included in the Related Forms in a supplemental Form 27. Abandonment will occur per the requirements of Rule 1105. During flowline abandonment, any liquids evacuated from the flowline will be contained and disposed per the requirements of Rule 905.
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**

403534985	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403573097	SOIL SAMPLE LOCATION MAP
403582077	FORM 27-INITIAL-SUBMITTED

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)