

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
403436474  
Receive Date:  
10/24/2023  
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: <u>MURFIN DRILLING COMPANY INC</u>	Operator No: <u>61650</u>	Phone Numbers Phone: <u>(316) 858-8664</u> Mobile: <u>( )</u>
Address: <u>250 N WATER ST STE 300</u>		
City: <u>WICHITA</u>	State: <u>KS</u>	Zip: <u>67202</u>
Contact Person: <u>Christina Goodrich</u>	Email: <u>cgoodrich@murfininc.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27407 Initial Form 27 Document #: 403311450

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>099-06248</u>	County Name: <u>PROWERS</u>
Facility Name: <u>SCHNEIDER 1-3</u>	Latitude: <u>38.159891</u>	Longitude: <u>-102.575001</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>3</u>	Twp: <u>22S</u>	Range: <u>46W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>314195</u>	API #: _____	County Name: <u>PROWERS</u>
Facility Name: <u>SCHNEIDER-622S46W 3SWSW</u>	Latitude: <u>38.159891</u>	Longitude: <u>-102.575001</u>	
** correct Lat/Long if needed: Latitude: <u>38.159856</u>		Longitude: <u>-102.575358</u>	
QtrQtr: <u>SWSW</u>	Sec: <u>3</u>	Twp: <u>22S</u>	Range: <u>46W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications MH \_\_\_\_\_

Most Sensitive Adjacent Land Use crop land \_\_\_\_\_

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? Yes \_\_\_\_\_

### **Other Potential Receptors within 1/4 mile**

## 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	GROUNDWATER	No hydrocarbon impacts encountered	Groundwater samples/laboratory analytical results
No	SOILS	No hydrocarbon impacts encountered	Inspection/soil samples/laboratory analytical results

## INITIAL ACTION SUMMARY

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

Wellhead cut and cap and facility decommissioning operations were completed at the Schneider 1-3 wellhead and Schneider 62S46W 3SWSW facility on March 9 - May 4, 2023. Groundwater was not encountered during decommissioning activities. Visual inspection and field screening of soils around the wellhead, associated flowline, and facility equipment was conducted following wellhead cut and cap operations and facility removal activities, and soil sample (WH-B01@6', FL-B01@4', SEP-B01@3", SEP-B02@3", SEP-B02@6", SWT-B01@3") were submitted for laboratory analysis to determine if a release occurred. Laboratory analytical results indicated that boron was elevated in soil at the former separator location (SEP-B02@3"). An additional confirmation sample was collected at the former separator location (SEP-B02@6") and submitted for laboratory analysis of boron. Both samples (SEP-B02@3", SEP-B02@6") were re-run for laboratory analysis of boron. Laboratory analytical results indicated the boron concentration was within analytical variability of site-specific background levels. The remaining analytical results for the soil samples collected during wellhead cut and cap, flowline removal operations, and facility decommissioning activities were in compliance with COGCC standards. A topographic Site Location Map showing the geographic setting of the site location is provided as Figure 1. Soil sample location and field screening data are presented in Table 1. The soil sample and field screening locations are illustrated on Figure 2.

## 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 ):

On March 9 - May 4, 2023, soil samples were collected from the base of the cut and cap excavation area (WH-B01@6'), from the locations where the flowline risers were disconnected at the wellhead (FL-B01@4') and separator (SEP-B01@3"), beneath the former separator (SEP-B02@3", SEP-B02@6"), and beneath the former storage tank (SWT-B01@3"). The soil samples were submitted for laboratory analysis of BTEX, naphthalene, TMBs, TPH, pH, EC, SAR, and boron using COGCC approved methods. Analytical results indicated that constituent concentrations in the soil samples were in compliance with COGCC Table 915-1 standards, with the exception of the boron value in samples SEP-B02@3" and SEP-B02@6". The boron values were within the acceptable range of analytical variability, and it alone does not indicate that a hydrocarbon release occurred at the former separator location. As such, it was determined to be acceptable to leave in place. Soil analytical results are presented in Tables 2 and 3.

### Proposed Groundwater Sampling

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

Groundwater was not encountered during decommissioning activities.

### 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 ):

On March 9 - May 4, 2023, visual inspections and field screening of soils was conducted at 4 sidewall locations within the wellhead excavation area, 4 locations at the ground surface adjacent to the excavation, one flowline removal pothole, one former SWT, and one former meter run. Based on the inspection and screening results, hydrocarbon-impacted soils were not observed at the soil screening locations. As a result, no soil samples were submitted for laboratory analysis from these areas in accordance with the COGCC Operator Guidance for Oil & Gas Facility Closure document. Soil sample location and field screening data are presented in Table 1. Soil analytical results are summarized in Tables 2 and 3. The soil sample and field screening locations are illustrated on Figure 2. The laboratory analytical reports are provided as Attachment A. The field notes and photographic log are provided as Attachment B.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 10  
Number of soil samples exceeding 915-1 0  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 0

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 1.66  
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?

Background soil samples BG01@3", BG01@6", BG02@3", and BG03@3" were collected from native material adjacent to the production facility. The background soil samples were submitted for laboratory analysis of the Soil Suitability for Reclamation Parameters using standard methods appropriate for detecting the target analytes in Table 915-1. Analytical results for the background soil samples are presented in Table 3. Background locations are presented in Figure 2.

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.

Laboratory results indicate that constituent concentrations in the soil samples collected from the base of the wellhead cut and cap excavation area (WH-B01@6") during flowline removal (FL-B01@4"), and facility decommissioning (SEP-B01@3", SEP-B02@3", SEP-B02@3", SWT-B01@3") were in compliance with the COGCC Table 915-1 standards, with the exception to the boron value for SEP-B02@3" and SEP-B02@6". However, the boron results and re-run results indicated that it was within an acceptable range of analytical variability of background concentrations, and it alone does not indicate that a hydrocarbon or produced water release occurred at the former separator location. As such, it was determined to be acceptable to leave in place, and no soils were 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.

Laboratory results indicate that constituent concentrations in the soil samples collected from the base of the wellhead cut and cap excavation area (WH-B01@6') during flowline removal (FL-B01@4'), and facility decommissioning (SEP-B01@3", SEP-B02@3", SEP-B02@3", SWT-B01@3") were in compliance with the COGCC Table 915-1 standards, with the exception to the boron value for SEP-B02@3" and SEP-B02@6". However, the boron results and re-run results indicated that it was within an acceptable range of analytical variability of background concentrations, and it alone does not indicate that a hydrocarbon or produced water release occurred at the former separator location. Groundwater was not encountered during decommissioning activities. Based on the analytical and soil screening data presented herein, assessment is complete at this site and no further activities are required. As such, Murfin Drilling is requesting a No Further Action (NFA) determination for this location.

**Soil Remediation Summary**

In Situ

Ex Situ

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

- \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_
- \_\_\_\_\_ 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.

# REMEDIATION PROGRESS UPDATE

## PERIODIC REPORTING

### Approved Reporting Schedule:

Quarterly     Semi-Annually     Annually     Other    Final Report

### 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    NFA Request

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

## WASTE DISPOSAL INFORMATION

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

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.

The site will be reclaimed in accordance with COGCC 1000 Series Reclamation Rules. Timeliness of reclamation initiation and completion will be subject to NFA, surface owner discretion and land use, and suitable ground conditions which allow for execution of surface reclamation activities so as to not cause unwarranted damages.

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? Yes

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

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

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 06/17/2024

Proposed date of completion of Reclamation. 06/17/2024

## 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). 03/09/2023

Proposed site investigation commencement. 03/09/2023

Proposed completion of site investigation. 05/04/2023

### 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**

Based on the analytical and soil screening data provided herein, assessment is complete and Murfin Drilling is requesting an NFA determination for this location.

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

Signed: Christina Goodrich

Title: Production Engineer

Submit Date: 10/24/2023

Email: cgoodrich@murfininc.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: 11/16/2023

Remediation Project Number: 27407

**COA Type****Description**

	This Form 27 Supplemental is being approved as submitted. However, the next Form 27 Supplemental must be populated with the Adequacy of Operator's General Liability Insurance and Financial Assurance data field under the Remediation Progress Update tab to describe how Operator's Financial Assurance meets the requirements of Rule 703.b. and General Liability Insurance meets the requirements of Rule 705.b.
	If impacted soils are encountered during facility decommissioning, the impacted soil will be segregated for proper offsite disposal and the lateral and vertical extent of impacts shall be determined with appropriate confirmation soil sampling. Operator will expand the analyte list to include all Table 915-1 contaminants of concern.
	If flowlines are decommissioned they will need to be documented as a facility and updated on the next supplemental from 27. Flowline decommissioning shall be conducted as follows; Operator shall 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.
	COA in Form 6 Doc# 403237883 states; Properly abandon flowlines per Rule 1105. If flowlines will be abandoned in place, include with the Form 27: pressure test results conducted in the prior 12 months as well as identification of any document numbers for a COGCC Spill/Release Report, Form 19, associated with the abandoned line
	ECMC noted there is no analytical data for Metals, Operator shall sample for Table 915-1 Metals in Soils.
	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area
	ECMC removed the final closure request from this Form 27. Elevated levels of Boron at SEP-B02@3", SEP-BO2@3" Re-run 1 and Re-run 2 are more than 1.25 times elevated above background levels.
7 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**

403436474	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403436593	OTHER
403436594	PHOTO DOCUMENTATION
403436601	SITE MAP

403436602	SOIL SAMPLE LOCATION MAP
403436604	ANALYTICAL RESULTS
403436606	ANALYTICAL RESULTS
403598510	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

**General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
		Stamp Upon Approval

Total: 0 comment(s)