

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
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Receive Date:  
\_\_\_\_\_  
Report taken by:  
\_\_\_\_\_

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: IMPETRO RESOURCES LLC Operator No: 10690 Phone Numbers  
Address: 558 CASTLE PINES PKWY UNIT B-4 Phone: (361) 935-5633  
City: CASTLE PINES State: CO Zip: 80108 Mobile: ( )  
Contact Person: Brent Bongers Email: bbongers@impetroresources.com

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 16586 Initial Form 27 Document #: 402300869

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

No Multiple Facilities

Facility Type: SPILL OR RELEASE Facility ID: 459536 API #: \_\_\_\_\_ County Name: WASHINGTON  
Facility Name: bLOMENKAMP 4 Latitude: 39.785663 Longitude: -103.670775  
\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
QtrQtr: SESE Sec: 17 Twp: 3S Range: 56W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications OH Most Sensitive Adjacent Land Use pasture  
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**

The nearest domestic groundwater well indicated a static groundwater level of 14 feet bgs on September 23, 1968 (Permit #35232). Beaver Creek, a registered Riverine habitat, is located approximately 1300 feet east of the Location. Multiple registered High Priority Habitats are located approximately 850 feet east of the Location.

**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
Yes	SOILS	small area of tph	visual and test

**INITIAL ACTION SUMMARY**

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

Location was previously operated by Alfred Ward & Son company (Operator #94300) during the initial Spill which occurred on 12/03/2018 (Spill No. 459536). Impetro Resources, LLC (Operator No. 10690) acquired the assets in July 2023. Based on review of the ECMC database and records search, the spill number and associated remediation project #16586 appear to remain unresolved. However, per the COAs on Form 19-S document #402578792 from January 19, 2021 and approval of Form 27-S Document #402658814 from April 14, 2021, remediation activities at the site were completed and approval for closure of the spill number and remediation project was granted, contingent on submittal of waste disposal manifests. One manifest was provided from March 22, 2019, for 20 cubic yards of impacted soil disposed of at Waste Management disposal facility. Impetro has attempted to identify and determine if additional waste disposal manifests exist, unsuccessfully. The main point of contact and responsible party for Alfred Ward & Son became deceased in 2023, subsequent to Impetro's purchase of the asset. The remaining responsible persons for the company are unable to determine or locate additional waste manifests. Impetro is requesting closure for the remediation project and will submit a Form 19-S closure report under this remediation project number.

**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 ):

Impetro Resources, LLC is requesting closure of the remediation project based on soil analytical testing and dig and haul remediation activities performed by the previous operator of the site between 2018 and 2020 and ECMC approval of previous remediation activities.

**Proposed Groundwater Sampling**

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

Groundwater was not encountered during spill response or remediation activities completed by the previous operator.

**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 22  
Number of soil samples exceeding 915-1 2  
Was the areal and vertical extent of soil contamination delineated? Yes         
Approximate areal extent (square feet) 250

### NA / ND

-- Highest concentration of TPH (mg/kg) 1190  
-- Highest concentration of SAR 3.44  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 4

### 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) 20                      Volume of liquid waste (barrels) 0

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.

The previous operator for this location performed excavation, transport, and disposal of a minimum of 20 cubic yards of impacted soil to a Waste Management disposal facility in 2019. As stated previously, the ECMC approved the remediation and delineation activities performed by the previous operator on Form 19-S document number 402578792 and Form 27-S document number 402658814, contingent on providing waste manifests for impacted soil disposal. One waste manifest (Doc #402303327) was identified in the ECMC database and includes disposal of 20 cubic yards of impacted material.

### REMEDICATION 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.

The previous operator for this location performed excavation, transport, and disposal of a minimum of 20 cubic yards of impacted soil to a Waste Management disposal facility in 2019.

## Soil Remediation Summary

In Situ

Ex Situ

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

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

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

\_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 20

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

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

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

\_\_\_\_\_ 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 Remediation Update and Closure 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 carries general liability insurance of \$1,000,000.00 per occurrence and \$4,000,000.00 in excess. Operator carries \$25,000.00 blanket surface surety bond.

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

## 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:

Approximately 20 cubic yards of impacted soil was excavated, transported, and disposed of at a Waste Management disposal facility.

Volume of E&P Waste (solid) in cubic yards 20

E&P waste (solid) description E&P Waste impacted soil

COGCC Disposal Facility ID #, if applicable:

Non-COGCC Disposal Facility: Waste Management

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? No

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.

Impetro Resources acquired the asset in July 2023 and continues to operate the facility. No deficiencies in facility operations have been observed.

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. \_\_\_\_\_

Proposed date of completion of Reclamation. \_\_\_\_\_

## 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). 05/05/2019

Proposed site investigation commencement. 12/30/2020

Proposed completion of site investigation. 12/30/2020

### 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**

Location was previously operated by Alfred Ward & Son company (Operator #94300) during the initial Spill which occurred on 12/03/2018 (Spill No. 459536). Impetro Resources, LLC (Operator No. 10690) acquired the assets in July 2023. Based on review of the ECMC database and records search, the spill number and associated remediation project #16586 appear to remain unresolved. However, per the COAs on Form 19-S document #402578792 from January 19, 2021 and approval of Form 27-S Document #402658814 from April 14, 2021, remediation activities at the site were completed and approval for closure of the spill number and remediation project was granted, contingent on submittal of waste disposal manifests. One manifest was provided from March 22, 2019, for 20 cubic yards of impacted soil disposed of at Waste Management disposal facility. Impetro has attempted to identify and determine if additional waste disposal manifests exist, unsuccessfully. The main point of contact and responsible party for Alfred Ward & Son became deceased in 2023, subsequent to Impetro's purchase of the asset. The remaining responsible persons for the company are unable to determine or locate additional waste manifests. Impetro is requesting closure for the remediation project and will submit a Form 19-S closure report under this remediation project number.

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

Signed: Brent Bongers

Title: President

Submit Date: \_\_\_\_\_

Email: bbongers@impetroresources.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: 16586

**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**

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Total Attach: 0 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)