

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

403691862

Receive Date:

02/26/2024

Report taken by:

KRIS NEIDEL

## 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: WESCO OPERATING INC | Operator No: 95520                 | Phone Numbers<br>Phone: (307) 5775329<br>Mobile: ( ) |
| Address: 120 S DURBIN STREET          |                                    |  |
| City: CASPER State: WY Zip: 82602     |                                    |  |
| Contact Person: Dave Weinert          | Email: davew@kirkwoodcompanies.com |  |

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 10268 Initial Form 27 Document #: 401298580

## 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: quarterly monitoring report for soil and groundwater remediation system

## SITE INFORMATION

No Multiple Facilities

|   |                     |                        |   |
|---|---------------------|------------------------|---|
| Facility Type: SPILL OR RELEASE           | Facility ID: 428531 | API #:                 | County Name: MOFFAT                       |
| Facility Name: Maudlin Gulch Tank Battery | Latitude: 40.286188 | Longitude: -108.025465 |   |
| ** correct Lat/Long if needed: Latitude:  |                     | Longitude:             |   |
| QtrQtr: NESW                              | Sec: 26             | Twp: 4N                | Range: 95W Meridian: 6 Sensitive Area? No |

## SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Grazing

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

Two facility spill containment ponds along with a separate pond are located within 1/4 mile of the facility. The upper pond (#1) has been lined.

## 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       | GROUNDWATER    | known            | analyzed       |
| Yes       | SOILS          | known            | analyzed       |

### INITIAL ACTION SUMMARY

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

Impacted soils from facility were taken to an approved landfill, see previously submitted form 27's. Additional investigation derived contaminated soils generated as part of the investigation work will also be disposed of at an approved landfill. Investigation derived liquids will be placed into the existing produced water/oil treatment system.

### 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 ):

See previously submitted form 27's's.

#### Proposed Groundwater Sampling

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

See previously submitted form 27's's.

#### Proposed Surface Water Sampling

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

See previously submitted Form 27's's.

### 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 57  
Number of soil samples exceeding 915-1 34  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 54625

### **NA / ND**

-- Highest concentration of TPH (mg/kg) 15423  
-- Highest concentration of SAR 7.06  
BTEX > 915-1 Yes  
Vertical Extent > 915-1 (in feet) 20

### **Groundwater**

Number of groundwater samples collected 82  
Was extent of groundwater contaminated delineated? Yes  
Depth to groundwater (below ground surface, in feet) 2  
Number of groundwater monitoring wells installed 11  
Number of groundwater samples exceeding 915-1 2

-- Highest concentration of Benzene (µg/l) 251  
ND Highest concentration of Toluene (µg/l)             
-- Highest concentration of Ethylbenzene (µg/l) 13  
-- Highest concentration of Xylene (µg/l) 187  
-- Highest concentration of Methane (mg/l) 0.13

### **Surface Water**

2 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?

A shallow background soil sample was collected near MW-12, in addition, two soil samples from MW-12 were analyzed for arsenic concentration to determine background.

☒ Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 5 Volume of liquid waste (barrels) 15

☐ 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.

Soil excavation of a portion of the source has been completed. See previously submitted Form 27s's.

## **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.

A remedial action plan was submitted to the COGCC. The system has been installed and is operational.

## **Soil Remediation Summary**

☒ In Situ

☒ Ex Situ

           Bioremediation ( or enhanced bioremediation )

           Yes            Excavate and offsite disposal

☐ Chemical oxidation  
☐ Yes Air sparge / Soil vapor extraction  
☐ Natural Attenuation  
☐ Other \_\_\_\_\_

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  
☐ Yes Air sparge / Soil vapor extraction  
☐ Yes 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.

Please refer to the previously submitted remedial action plan.

## 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 quarterly report of remediation system operations including groundwater monitoring.

### 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: \$ \_\_\_\_\_

### 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:

See previously submitted Form 27s's. E&P liquid waste as described below is being injected into the field injection wells.

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_ 2000

E&P waste (solid) description excavated soil, liner, drill cuttings,  
pothole cuttings

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: see previously submitted Form 27s \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_ 260

E&P waste (liquid) description fluids from remediation well  
development, monitoring well  
purging, SVE system recovered fluids

COGCC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-COGCC Disposal Facility: see previously submitted Form 27s \_\_\_\_\_

## 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? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

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.

NA

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. \_\_\_\_\_

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). 08/06/2018

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**

Attached please find the quarterly report for the remediation system for the period August 1st, 2023 through October 31st, 2023

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

Signed: Dave Weinert

Title: HSE Coordinator

Submit Date: 02/26/2024

Email: davew@kirkwoodcompanies.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: KRIS NEIDEL

Date: 03/01/2024

Remediation Project Number: 10268

**COA Type****Description**

|       |  |
|-------|--|
|       | The next quarter of groundwater sampling should include all wells and Inorganic parameters in Table 915-1. |
| 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**

|           |                                |
|-----------|--------------------------------|
| 403691862 | FORM 27-SUPPLEMENTAL-SUBMITTED |
| 403699134 | MONITORING REPORT              |

Total Attach: 2 Files

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

|               |   |            |
|---------------|---|------------|
| Environmental | It is stated, "The COGCC selected monitoring wells were sampled on October 25th, 2023." It is the Operators responsibility to propose remediation methods they determine are best to achieve compliance with Table 915-1. If the operator feels other wells should be "selected" or any other additional methods to achieve compliance, it should be proposed on a form 27. | 03/01/2024 |
|---------------|---|------------|

Total: 1 comment(s)