



WELLINGTON OPERATING COMPANY

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**WELLINGTON OPERATING COMPANY
WELLINGTON MUDDY UNIT/GAULT-PIATT #20-3
API#: 05-069-05168
CORRECTIVE ACTION REPORT**

PREPARED BY:
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WASTEWATER TREATMENT OPERATOR
OPERATOR IN RESPONSIBLE CHARGE

MARCH 6, 2024

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DISCOVERY:

Wellington Operating Company (WOC) operates the Wellington Muddy Sand Stone field facility located at 1590 East County Road 70, Wellington, Colorado. One of the temporarily abandoned wells WOC has is; API#: 05-069-05168-00 and identified as WELLINGTON MUDDY UNIT/GAULT-PIATT #20-3 (Well 20-3) and is being permanently abandoned.

During the well plugging and capping operation in April 2023, soil samples were collected from the well pad surface, a surface sample in the hay field that surrounds the well, and next to the well casing at seven feet in depth. The samples were submitted for analytical analysis and the excavation was backfilled to accommodate crop season and pasturing cattle after the final crop was harvested. The sample results indicated that there are levels for TPH that exceeded the Table 915 limit.

In January 2024 WOC was able to pothole to a depth of 10 feet and encountered a concrete basement floor around the well. A sample was collected and submitted for analysis from this depth and the results indicated that the TPH was below the limit in Table 915. Due to weather and additional field tasks that required action additional excavation was delayed until February 22, 2024.

On February 22, 2024, excavation restarted and a thin black oily layer up to 12 inches thick was encountered at approximately eight feet in depth. This layer along with soils above and below were excavated to a depth of ten feet. The soils were stockpiled and shipped to Pawnee Disposal for disposal.

The landowner was made aware of the history spill/release that was discovered on February 22, 2024, by Cameron Gracey, Field Supervisor.

February 23, 2024, based on the estimated volume of contaminated soil from the excavation Randy Evans contacted Richard Allison of the Colorado Energy & Carbon Management Commission (ECMC) to notify him of the historic spill/release and the cleanup activities that were taking place. Mr. Evans additionally reported that a Form 19 Initial would be completed and submitted.

Mr. Evans then contacted Sydney McLeod of the Larimer County Health to notify her of the historic spill/release. She stated that she would notify Mr. Matt Lafferty, Principal Planner at Larimer County Planning Department.

February 26, 2024, Richard Allison advised Mr. Evans of the requirement to notify Lexi Hamous-Miller of the Colorado Parks and Wildlife concerning the historic spill/release that is within the mapped Mule Deer and Pronghorn Winter Concentration Areas pursuant to Rule 1202.d. Mr. Evans emailed and called Lexi Hamous-Miller and she was satisfied about the notification.

SITE REMEDIATION & INVESTIGATION:

The majority of the contaminated soils were removed and stockpiled on February 22, 2024, with some wall cleanup on after field checking the soils with a Honeywell MiniRAE 3000+ photo-ionization detector (PID). Readings above 5 resulted in additional excavation. WOC was working to have PID readings at or below 1 which was achieved. A site map of the approximate size and shape of the excavation is included in the maps attached to this submittal. The site map also includes the approximate locations of the wall samples collected from the excavation.

Side wall soil samples were collected and submitted to Pace Laboratory for analysis. The samples were collected on February 23, 2024, were maintained in a refrigerator for shipment to the laboratory on February 26, 2024.

Groundwater was not encountered during the excavation. During excavation weathered shale was encountered from levels seven to eight feet below grade and continued to the bottom of the excavation.

Mr. Richard Allison of ECMC preformed a site visit on February 26, 2024 and has filed an inspection report which is referenced in "Related Forms". Mr. Allison indicated that our remediation appeared to be in line with the ECMC rule requirements pending the laboratory results of the soil samples from the excavation being submitted to the laboratory.

Starting February 26, 2024, the excavated impacted soils were manifested and transported to Pawnee Disposal facility for proper disposal under Profile #: EPS0510221. A shipped total along with copies of the manifests will be included in the Form 27 Supplemental to be filed by March 23, 2024.

March 5, 2024, the laboratory results were received and reviewed. The only parameter that does not meet the limits in Table 915 is the pH of three of the samples. A summary spreadsheet of the sample data is included in the attachment section of this report. The laboratory results were reviewed verbally with Mr. Allison and he has requested that WOC collect additional samples in the plant root zone above the depths that the initial samples were collected at and have these samples analyzed for the parameters in Table 915. Additionally, another background sample will be collected from a pothole to be dug near the well site that will provide samples for background analysis at the same levels that the excavation samples were collected at.

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SUMMARY:

This historic spill was contained in a small area around the well head and based on initial sampling has been successfully remediated pending additional soil sampling results. There is a summary attached to this Form 19 of the laboratory data available to date. All laboratory analytical reports will be attached to the following Form 27 Supplemental report.

The results for pending samples will be reported in Form 27 Supplemental reports as the data becomes available. All laboratory analytical reports will be attached to the following Form 27 Supplemental report.

The total volume of soil transported to Pawnee Disposal will be reported along with copies of the manifests will be reported in the following Form 27 Supplemental report.