

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:

403664082

Receive Date:

01/24/2024

Report taken by:

Jason Kosola

## 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 ECMC 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>ENDURING RESOURCES LLC</u>	Operator No: <u>10663</u>	<b>Phone Numbers</b> Phone: <u>(720) 768-3575</u> Mobile: <u>(720) 768-3575</u>
Address: <u>6300 S SYRACUSE WAY, SUITE 525</u>		
City: <u>CENTENNIAL</u> State: <u>CO</u> Zip: <u>80111</u>		
Contact Person: <u>Kayla White</u>	Email: <u>kwhite@cdhconsult.com</u>	

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 34558 Initial Form 27 Document #: 403664082

## 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: <u>PIT</u>	Facility ID: <u>115980</u>	API #: _____	County Name: <u>LA PLATA</u>
Facility Name: <u>SAM BURCH 9</u>	Latitude: <u>37.051249</u>	Longitude: <u>-107.837857</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>4</u>	Twp: <u>32N</u>	Range: <u>9W</u> Meridian: <u>N</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications SP Most Sensitive Adjacent Land Use commercial

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

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

- ☐ E&P Waste
 ☐ Other E&P Waste
 ☒ Non-E&P Waste
- ☐ Produced Water
 ☐ Workover Fluids
 ☐ We believe this pit was never constructed
- ☐ 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	SOILS	none	review of drone imagery

### INITIAL ACTION SUMMARY

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

In August 2023 Enduring Resources, LLC (Enduring) and CDH Consulting, LLC, (CDH), conducted a thorough desktop analysis of all identified Enduring owned pits not closed in the ECMC database. These pit locations were historic locations that were permitted before Enduring Resources took ownership of the assets in the area. The Sam Burch 9 pit location was originally permitted by the Texaco Oil Company in 1977 and was reclaimed before Enduring took ownership in 2017. However proper closure documentation was not submitted to ECMC by the prior operator and the record remains open in the ECMC database. This Form 27 serves as a closure request for the Sam Burch 9 pit location, ECMC location ID: 115980. During the desktop analysis, CDH reviewed operating documents from Enduring, reviewed historically filed document on the ECMC database, and viewed historic imagery from available resources including Google Earth and recently collected drone data to determine the presence or absence of previously permitted pits. For the Sam Burch 9 pit location, it was determined based on the desktop review that a pit likely never existed

### 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 ):

#### Proposed Groundwater Sampling

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

#### 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 \_\_\_\_\_ 0  
Number of soil samples exceeding 915-1 \_\_\_\_\_  
Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_  
Approximate areal extent (square feet) \_\_\_\_\_

### NA / ND

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.

Please see the attached drone imagery collected on April 17, 2023 for reference. No pit exists and we do not believe a pit was ever constructed.

### 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.

CDH conducted a thorough review of the ECMC database along with securing drone imagery and determined that a pit likely never existed. Please see the included attachments for reference and support of our position

### Soil Remediation Summary

☐ In Situ

☐ Ex Situ

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

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

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

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

\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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

☐ **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 anticipates the remaining cost for this project to be: \$

### 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

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

Volume of E&P Waste (liquid) in barrels

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC 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.

Please see the attached drone imagery collected on April 17, 2023 for reference. No pit exists and we do not believe a pit was ever constructed.

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). 04/17/2023

Proposed site investigation commencement. 04/17/2023

Proposed completion of site investigation. 04/17/2023

## **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**

The ECMC historic records database shows an active pit at the Sam Burch 9 location with a status date of 9/23/1999. All available ECMC database files were reviewed, as well as any available operator documents pertaining to this facility. There was no evidence that the pit was ever constructed or used. The only document referencing the pit was the initial Form 15, Document ID: 656445. In addition to a records review, historic imagery from Google Earth and recently acquired drone imagery had no indication of a pit being constructed on site at any point. Due to lack of evidence that a pit existed, no soil sampling is to be conducted and Enduring respectfully requests that this record be closed administratively.

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

Signed: Danielle Gavito

Title: Senior Regulatory Analyst

Submit Date: 01/24/2024

Email: dgavito@cdhconsult.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Jason Kosola

Date: 03/20/2024

Remediation Project Number: 34558

## **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**

403664082	FORM 27-INITIAL-SUBMITTED
403664277	AERIAL IMAGE
403664290	OTHER

Total Attach: 3 Files

## **General Comments**

### **User Group**

### **Comment**

### **Comment Date**

Environmental	Search of ECMC records and review of historical aerial photos do not show evidence of this pit.	03/20/2024
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Total: 1 comment(s)