

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

403725429

Receive Date:

03/19/2024

Report taken by:

ALEX FISCHER

## 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: POC-I LLC	Operator No: 10386	Phone Numbers Phone: (307) 237-7854 Mobile: (307) 746-6468
Address: P.O. BOX 51208		
City: CASPER State: WY Zip: 82605		
Contact Person: Rebecca Podio	Email: rpodio@gmail.com	

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 34712 Initial Form 27 Document #: 403725429

## 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: TANK BATTERY	Facility ID: 480890	API #: _____	County Name: MOFFAT
Facility Name: Iles Dome Tank Battery	Latitude: 40.306138	Longitude: -107.688780	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? Yes

## SITE INVESTIGATION PLAN

**TYPE OF WASTE:**☒ **E&P Waste** ☐ **Other E&P Waste** ☒ **Non-E&P Waste**☒ Produced Water☐ Workover Fluids

Cement

☒ 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
UNDETERMINED	SOILS	Unknown	Will sample exposed area once structure is removed

**INITIAL ACTION SUMMARY**

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

The large cement sump/pit, which has been integral to the field's operations for years, may present a potential environmental hazard. The decision to decommission and remove this structure is motivated by the need to eliminate possible sources of contamination, adhere to environmental regulations, and optimize the field's design and functionality layout for future operational improvements.

**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 ):

Samples of the soil around the structure of the cement pit will be taken once the structure is removed.

**Proposed Groundwater Sampling**

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

Groundwater samples will be taken from the monitor wells near the cement pit.

**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

NA / ND

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)

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?

Soil sampling will occur after the cement sump/pit has been removed.

## REMEDIAL ACTION PLAN

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The structure of the cement pit will be removed using heavy equipment, and the material removed will be disposed of properly. Any contaminated soil that is discovered after the pit structure is removed will also be removed using heavy equipment.

### 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.

The structure of the cement pit will be removed using heavy equipment, and the material removed will be disposed of properly. Any contaminated soil that is discovered after the pit structure is removed will also be removed using heavy equipment.

### Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation ( or enhanced bioremediation )

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 100

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or COGCC Facility ID #

Natural Attenuation

No 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

### 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.

The site of the cement pit will be backfilled, compacted, and leveled. It will be covered with gravel, and new production equipment will be placed where the cement pit was to expand the treatment capacity of the tank battery without adding additional disturbance.

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). 05/01/2024

Proposed site investigation commencement. 05/15/2024

Proposed completion of site investigation. 05/20/2024

## REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/01/2024

Proposed date of completion of Remediation. 08/01/2024

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**

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

Signed: Rebecca Podio

Title: Petroleum Engineer

Submit Date: 03/19/2024

Email: rpodio@gmail.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: ALEX FISCHER

Date: 03/29/2024

Remediation Project Number: 34712

**COA Type****Description**

	COA: Prior to adding additional equipment to the Location or Facilities, the Operator shall have approved ECMC and CDPHE permits and provide evidence that they have complied with any Relevant Local Government land use regulations and facility siting or construction or operation requirements.
	<p>COA: It is stated, "The site of the cement pit will be backfilled, compacted, and leveled. It will be covered with gravel, and new production equipment will be placed where the cement pit was to expand the treatment capacity of the tank battery without adding additional disturbance."</p> <p>The Operator does not provide a timeline for when this equipment will be placed in the vicinity of the concrete tank.</p> <p>Operator shall backfill the excavation with soil similar to native/existing soil until a timeline for adding this equipment has been established.</p>
	COA: No part of the cement structure shall be buried on site. Operator shall dispose of the concrete at an approved facility. Disposal manifest shall be submitted on a supplemental Form 27.
	COA: It is stated that the "Cement and Cover" will be cleaned on site and the fluids recovered with a vac truck. Fluids from cleaning the "Cement and Cover" and any soil that is impacted through the cleaning process shall be handled as E&P Waste, sampled and analyzed for Table 915-1 constituents, and disposal of at an approved facility. Operator shall ensure that 100% of fluids are captured.
	COA: Operator did not complete the PERIODIC REPORTING Schedule. It is stated that this project may take 5 months to complete, this would put the completion date into October 2024. Within 30-days of Staff approval of F27 Doc #403725429, Operator to provide the reporting schedule.
	COA: Any other facilities (combustors) that may be removed or destroyed as a result of the decommissioning of the concrete tank shall be captured on an approved Form 27 and soil samples collected and analyzed for Table 915-1 Cleanup Concentration Constituents.
	COA: An adequate number of monitoring wells shall be re-installed in the vicinity of the concrete pit.
	COA: Monitoring wells MW-2, MW-6, MW-7, and MW-10, shall be abandoned in accordance with the State Engineer's Office Division of Water Resources (DWR) Guidelines. If the MWs are abandoned, documentation shall be provided to ECMC within 30- days of abandonment.
	<p>COA: Any groundwater impacts discovered during the decommissioning of the concrete tank shall be addressed under REM 8398.</p> <p>Groundwater monitoring under REM 8398 shall continue on a quarterly basis.</p>

	COA: Operator did not complete the Adequacy of Operator's General Liability Insurance and Financial Assurance.  Within 30-days of Staff approval of F27 Doc #403725429, Operator to provide a detailed cost and task breakdown for the decommissioning of the concrete tank.
	Provide notice to Environmental staff, Kris Neidel (kris.neidel@state.co.us) or 970-846-5097 72hrs prior to mobilization at beginning of all sampling events or Field work on this project.
	COA: Groundwater may be encountered during the decommissioning of the concrete tank. Any groundwater impacts discovered during the decommissioning of the concrete tank shall be addressed and reported on a supplemental Form 27.
	COA: If groundwater accumulates in the excavation, samples shall be collected and analyzed for constituents listed in Rule 615.e., Table 915-1, VOCs and SVOCs (EPA Methods 8260 and 8270). If free hydrocarbon product (including a sheen) is observed, groundwater shall be removed and disposed of at an approved facility.
	COA: The Operator shall obtain the appropriate permits for the removal or dewatering of any excavations (State Engineer's Office, Department of Water Resources).
	COA: The Operator shall obtain the appropriate permits for the discharge of any fluids from an excavation (CDPHE).
	COA: The operator shall take precautions to prevent groundwater from encountering potential E&P impacted Waste (soil), groundwater that is in contact with potential E&P impacted Waste is considered E&P Waste.
16 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.

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
403725429	FORM 27-INITIAL-SUBMITTED
403725430	REMEDIAL ACTION PLAN
403725431	OTHER
403725433	AERIAL IMAGE

Total Attach: 4 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)