

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 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: MULL DRILLING COMPANY INC Operator No: 61250 Phone Numbers  
Address: 1700 N WATERFRONT PKWY B#1200 Phone: (316) 895-1596  
City: WICHITA State: KS Zip: 67206-6637 Mobile: ( )  
Contact Person: Dustin Damme Email: dustin@mullcompanies.com

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 22774 Initial Form 27 Document #: 403005614

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: WELL Facility ID: API #: 061-06780 County Name: KIOWA  
Facility Name: PATTIE 2-2 Latitude: 38.601340 Longitude: -102.755820  
\*\* correct Lat/Long if needed: Latitude: 38.601392 Longitude: -102.755839  
QtrQtr: SWSE Sec: 2 Twp: 17S Range: 48W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Range Land  
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

**Other Potential Receptors within 1/4 mile**

Location is within HPH (Lesser Prairie Chicken Focal Area)

**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
UNDETERMINED	GROUNDWATER	TBD	Lab analysis if encountered
UNDETERMINED	SOILS	TBD	Lab analysis

**INITIAL ACTION SUMMARY**

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

On 4/19/22 3 samples and 4 BG samples were collected. Analytical results indicate elevated Arsenic and/or SAR at B5 and B7. Due to issues with the landowner, Mull Drilling has not had access to the site since the 4th quarter of 2022. Mull is seeking a variance (Docket No. 240200045) per Rule 502.B.

**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 ):

If encountered, a minimum of one grab sample will be collected as soon as practical. Groundwater sample(s) will be analyzed for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chlorides) and organic compounds in water.

**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 6  
Number of soil samples exceeding 915-1 2  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 3300

**NA / ND**

-- Highest concentration of TPH (mg/kg) 39  
-- Highest concentration of SAR 12.3  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 1

**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?

Four Background Samples (B1, B2, B3, B4) were collected on 4/19/22.

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**

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.

NA

**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.

NA

**Soil Remediation Summary**

In Situ

Ex Situ

\_\_\_\_ Bioremediation ( or enhanced bioremediation )      Yes      Excavate and offsite disposal

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

If Yes: Estimated Volume (Cubic Yards) 70  
Name of Licensed Disposal Facility or ECMC Facility ID # 208454  
 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.

NA



Is additional groundwater monitoring to be conducted? \_\_\_\_\_

Operator shall comply with the ECMC 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.

Reclamation will commence once the location is assessed for level and extent of impact.

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? Yes

### **SITE RECLAMATION DATES**

Proposed date of commencement of Reclamation. 01/01/2025

Proposed date of completion of Reclamation. 12/31/2026

## 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. 04/05/2022

Actual Spill or Release date, or date of discovery. 11/26/2007

### **SITE INVESTIGATION DATES**

Date of Initial Actions described in Site Investigation Plan (start date). 04/25/2022

Proposed site investigation commencement. 04/25/2022

Proposed completion of site investigation. 04/25/2024

### **REMEDIAL ACTION DATES**

Proposed start date of Remediation. 01/01/2024

Proposed date of completion of Remediation. 12/31/2024

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:

These dates are estimated dates for completion activities depending on Landowner objections.

**OPERATOR COMMENT**

Mull Drilling has not had access to the site since the 4th quarter of 2022. Mull is seeking a variance (Docket No. 240200045) per Rule 502.B.

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

Signed: Jessica Donahue \_\_\_\_\_

Title: Compliance Specialist \_\_\_\_\_

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

Email: jdonahue@ardorenvironmental.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: \_\_\_\_\_

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

Remediation Project Number: 22774

**COA Type**

**Description**

COA Type	Description
0 COA	

**ATTACHMENT 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**

Att Doc Num	Name

Total Attach: 0 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)