

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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403741739

Receive Date:

04/03/2024

Report taken by:

Chris Sanchez

## 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 ECOM 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) 264-6366
City: WICHITA	State: KS	Zip: 67206-6637
Contact Person: Dustin Damme	Email: Dustin@MullCompanies.com	Mobile: ( )

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 26220 Initial Form 27 Document #: 403237522

## 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: SPILL OR RELEASE	Facility ID: 482882	API #: _____	County Name: LINCOLN
Facility Name: Braukmann Farms C Tank Battery	Latitude: 39.031853	Longitude: -103.275387	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 1	Twp: 12S	Range: 53W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Rangeland

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**

Cattle

**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
No	GROUNDWATER	Undertermined	Laboratory analysis if encountered
Yes	SOILS	Undertermined	Laboratory 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.

This Form 27 Supplemental is being submitted to meet the quarterly reporting. Excavation and confirmation samples are needed to determine vertical and lateral extent. Mull Drilling would like to request a reduced analytical suite for EC, SAR, pH and Boron only. Due to weather and timing for excavation, sampling at excavation site will be done by mid-April.

**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 ):

Excavation and subsequent confirmation samples are required to determine the extent of impact. Mull Drilling would like to request a reduced analytical suite for EC, SAR, pH and Boron only.

**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 15

Number of soil samples exceeding 915-1 12

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 7000

### **NA / ND**

-- Highest concentration of TPH (mg/kg) 134.6

-- Highest concentration of SAR 84.3

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 9

### **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

NA Highest concentration of Benzene (µg/l)

NA Highest concentration of Toluene (µg/l)

NA Highest concentration of Ethylbenzene (µg/l)

NA Highest concentration of Xylene (µg/l)

NA 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?

1 Background sample was collected (Upgradient Arsenic is 7.7 mg/kg, Local Clean-Up 9.625 mg/kg)

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

Volume of solid waste (cubic yards) 15

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Further excavation and confirmation sampling is required to confirm extent of impacts. Mull Drilling would like to request a reduced analytical suite for EC, SAR, pH and Boron only.

## **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.

Waste Approval process occurred this quarter for this location and the location to the South: Rem. Proj# 25832. Currently in holding pattern for initial excavation processes concurrent with the southern location.

## **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.

Further delineation of inorganic impacts will be conducted via soil sampling.

## **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)

Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_

☐ No ☐ Excavate and onsite remediation

☐ Land Treatment

☐ Bioremediation (or enhanced bioremediation)

☐ Chemical oxidation

☐ Other \_\_\_\_\_

### **Groundwater Remediation Summary**

☐ No ☐ Bioremediation ( or enhanced bioremediation )

☐ No ☐ Chemical oxidation

☐ No ☐ Air sparge / Soil vapor extraction

☐ No ☐ Natural Attenuation

☐ No ☐ 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

## 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 Remedial Progress

### 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 is in compliance with Rule 705 insurance requirements as well as Rule 702 Financial Assurance. The estimated cost below will cover additional excavation, sampling, and analytical towards closure.

Operator anticipates the remaining cost for this project to be: \$ 5000

### 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:

Waste is currently segregated onsite. All waste will be disposed of at a certified waste facility - Phantom Landfill or Waste Connections Landfill.

Volume of E&P Waste (solid) in cubic yards 15

E&P waste (solid) description EC and SAR Impacted Soils

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Phantom Landfill or Waste Connections Landfill

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description 0

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

## 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 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 inorganics are delineated.

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? No

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 05/31/2024

Proposed date of completion of Reclamation. 05/31/2025

## 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. 09/08/2022

Actual Spill or Release date, or date of discovery. 09/08/2022

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/08/2022

Proposed site investigation commencement. 09/08/2022

Proposed completion of site investigation. 04/30/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/01/2024

Proposed date of completion of Remediation. 05/31/2024

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:

**OPERATOR COMMENT**

This Form 27 Supplemental is being submitted to meet the quarterly reporting requirements. Analytical results will be submitted when they are received.

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: 04/03/2024

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: Chris Sanchez

Date: 04/24/2024

Remediation Project Number: 26220

**COA Type****Description**

	This Form is being approved. For all future submittals, Operator shall include historical and recent soil analytical data in a table format in updates.
	Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area
	Arsenic concentrations in confirmation soil samples exceed the Table 915-1 Residential Soil Screening Level Concentrations. Operator shall assure background samples for comparison are sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples. Operator will provide additional data to characterize arsenic concentrations at the site and to determine its source.
	ECMC approves the request for a Reduced Analyte Suite for pH, EC, SAR, Boron with the addition of Arsenic.  Operator shall define the vertical and lateral extent of impacts to soil
5 COAs	

**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**

403741739	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403767902	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 2 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)