

State of Colorado  
Energy & Carbon Management Commission

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403652430  
Receive Date:  
03/13/2024

Report taken by:  
RICK ALLISON

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: WELLINGTON OPERATING COMPANY	Operator No: 95233	Phone Numbers Phone: (970) 567-6871 Mobile: (970) 567-6871
Address: 15301 DALLAS PKWY SUITE 900		
City: ADDISON	State: TX	Zip: 75001
Contact Person: Cameron Gracey	Email: Graceyservices@msn.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28550 Initial Form 27 Document #: 403339688

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 #: 069-06069	County Name: LARIMER
Facility Name: WELLINGTON MUDDY SAND UNIT 35 -4	Latitude: 40.746140	Longitude: -105.041290	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NESE	Sec: 18	Twp: 9N	Range: 68W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Crops  
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? No

## SITE INVESTIGATION PLAN

### TYPE OF WASTE:

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> E&P Waste       | <input checked="" type="checkbox"/> Other E&P Waste             | <input checked="" type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water  | <input type="checkbox"/> Workover Fluids                        | Steel casing and flowline that will be recycled.  |
| <input type="checkbox"/> Oil             | <input type="checkbox"/> Tank Bottoms                           |   |
| <input type="checkbox"/> Condensate      | <input type="checkbox"/> Pigging Waste                          |   |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash                               |   |
| <input type="checkbox"/> Drill Cuttings  | <input type="checkbox"/> Spent Filters                          |   |
|  | <input type="checkbox"/> Pit Bottoms                            |   |
|  | <input checked="" type="checkbox"/> Other (as described by EPA) | Stained soils if discovered                       |

### DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	Not yet known	Visual

### INITIAL ACTION SUMMARY

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

There is no action to be taken at this time as excavation has not yet begun. Well has not produced for some time. No visual evidence of E&P Waste on surface.

### 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 ):

Depending on the excavation and pending discovery of wellbore fluids staining of the soil during excavation, soil samples will be collected. Soil Samples will be taken until they meet objectives in table 915-1.

#### 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

NA / ND

Number of soil samples collected 5

-- Highest concentration of TPH (mg/kg) 295.7

Number of soil samples exceeding 915-1 0

-- Highest concentration of SAR 1.05

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

BTEX > 915-1 No

Approximate areal extent (square feet) 20

Vertical Extent > 915-1 (in feet) 7

**Groundwater**

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) \_\_\_\_\_

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) \_\_\_\_\_

Depth to groundwater (below ground surface, in feet) \_\_\_\_\_

Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_

Number of groundwater monitoring wells installed \_\_\_\_\_

Highest concentration of Xylene (µg/l) \_\_\_\_\_

Number of groundwater samples exceeding 915-1 \_\_\_\_\_

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?

A background soil sample was collected and analyzed for the parameters in Table 915-1. The sample was collected from the surface of the agriculture field that surrounds the well, approximately 50-feet north-north east of the wellhead.

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? Yes

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

There is no current source of contamination

**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.

There are no known impacts to the soil at this time. If stained soils are found, they will be excavated and transported off-site. Soil sampling will be conducted until objectives in table 915-1 are met.  
  
03/13/2024 During the week of 03/04/2024 the farmer leasing the land containing the Well 35-4 from the surface owner ripped the access road and well pad area. The access road and well pad were inspected by Cam Gracey for WOC, the landowner and the farmer leasing the land. The results of this inspection by each of these men was that there was no gravel base in the area. Photos attached. The area is being returned to crop land and being planted for sugar beets,

**Soil Remediation Summary**

In Situ

Ex Situ

       Bioremediation ( or enhanced bioremediation )

       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 # \_\_\_\_\_  
 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.

There is no known impact to groundwater at this time.

# 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?    No       

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: \_\_\_\_\_

# REMEDIATION COMPLETION REPORT

## REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project?    Yes       

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?    Yes       

Does the previous reply indicate consideration of background concentrations?    Yes       

Does Groundwater meet Table 915-1 standards?    Yes

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.

The well has been shut-in and TA'd for a long period of time and there has been no production of downhole fluid for many years. During plugging and excavation of wellhead & casing, if any stained soils are discovered they will be removed and disposed of offsite. Soil testing will be completed until objectives in table 915-1 are met. The site will then be reclaimed and utilized for crops per the landowner. The flowlines will be abandoned in the fall of 2023 as described in attached reclamation plan.

UPDATE: The initial Form 27 was not approved in time to cut/cap wellhead and soil sample/reclaim location before the surface owner needed to plant crops. Since cutting & capping the wellhead, sampling soil, and reclaiming flowlines will all require extensive excavation the decision has been made to wait to sample soil, cut wellhead & cap beneath surface, and remove/reclaim flowlines until the fall - as described in the originally approved Form 27.

01/14/2024: All soils have been returned to the excavations and the site leveled. Any gravel for the access road and pad site will be ripped up and removed to meet the surface owner's requirements.

03/13/2024 During the week of 03/04/2024 the farmer leasing the land containing the Well 35-4 from the surface owner ripped the access road and well pad area. The access road and well pad were inspected by Cam Gracey for WOC, the landowner and the farmer leasing the land. The results of this inspection by each of these men was that there was no gravel base in the area. Photos attached. The area is being returned to crop land and being planted for sugar beets,

Is the described reclamation complete? Yes \_\_\_\_\_

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. 03/20/2023

Proposed date of completion of Reclamation. 04/01/2024

## 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). 03/06/2023

Proposed site investigation commencement. 03/20/2023

Proposed completion of site investigation. 10/30/2023

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/20/2023

Proposed date of completion of Remediation. 11/30/2023

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:

Changing Site Investigation & Remedial Action Dates due to surface owner crop planting activity. Will soil sample, cut & cap wellhead, and reclaim flowlines in crops after harvest in the fall.

01/14/2024: A work crew came to the site and excavated to cut off and cap the well on December 19, 2023. Randy Evans was notified that day the work was being preformed and the site was ready for sampling. Samples were collected and submitted for analysis. The results are provided as an attachment to this form.

02/09/2024 On 02/01/2024 a work crew excavated the portion of the flowlines from the well head west to the irrigation ditch where the lines had been previously excavated, cut, capped and a soil sample had been collected, analyzed and the results are included with this submittal.

**OPERATOR COMMENT**

[Empty text box for operator comment]

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

Signed: Randy Evans

Title: Wastewater Treatment ORC

Submit Date: 03/13/2024

Email: Revans@Wellingtonoperating.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: RICK ALLISON

Date: 04/24/2024

Remediation Project Number: 28550

**COA Type**

**Description**

	<p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>
1 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.

<b>Att Doc Num</b>	<b>Name</b>
403652430	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
403654134	CORRESPONDENCE
403654135	ANALYTICAL RESULTS
403654136	ANALYTICAL RESULTS
403682612	PHOTO DOCUMENTATION
403682616	MAP
403717948	PHOTO DOCUMENTATION
403768674	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

**General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>Operator stated in reclamation plan that "Any gravel for the access road and pad site will be ripped up and either plowed in with the soils to aid in keeping the soil loose for crops or removed and replaced based on the surface owner's preference."</p> <p>Gravel must be removed from the location. Operator shall revise reclamation plan to acknowledge removal of gravel. Gravel is not required to be disposed but cannot be plowed into field.</p> <p>Form is returned to draft for revision of plan.</p>	03/08/2024

Total: 1 comment(s)