

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

403772589

Receive Date:

05/01/2024

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: BAYSWATER EXPLORATION & PRODUCTION LLC	Operator No: 10261	Phone Numbers
Address: 730 17TH ST STE 500		Phone: (303) 893-2503
City: DENVER	State: CO	Zip: 80202
Contact Person: Brad Rogers	Email: brogers@bayswater.us	Mobile: ()

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27133 Initial Form 27 Document #: 403293670

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

Yes Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 123-24137	County Name: WELD
Facility Name: WAAG 25-22	Latitude: 40.552280	Longitude: -104.732340	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 25	Twp: 7N	Range: 66W
Meridian: 6	Sensitive Area? Yes		

Facility Type: LOCATION	Facility ID: 306185	API #: _____	County Name: WELD
Facility Name: WAAG-67N66W 25NWNW	Latitude: 40.552280	Longitude: -104.732340	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNW	Sec: 25	Twp: 7N	Range: 66W
Meridian: 6	Sensitive Area? Yes		

Facility Type:	OFF-LOCATION FLOWLINE	Facility ID:	461922	API #:		County Name:	WELD	
Facility Name:	WAAG T7N-R66W-S25 L01			Latitude:	40.553389	Longitude:	-104.727607	
				** correct Lat/Long if needed: Latitude:		Longitude:		
QtrQtr:	LOT 1	Sec:	25	Twp:	7N	Range:	66W	
					Meridian:	6	Sensitive Area?	Yes

SITE CONDITIONS

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

Other Potential Receptors within 1/4 mile

CR 78 450' N, CR 35 775' W, stock pond 600' NW, livestock 1,025' WSW, residence 1,120' SW

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	NA	lab analysis if encountered
Yes	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 4/3/24, the WAAG 25-22 plugged wellhead cut & cap excavation was assessed per approved SF27 document number 403293670. Grab soil samples were collected from the sidewalls in the 4 cardinal directions, as well as the floor of the excavation. Petroleum hydrocarbon staining and odor were observed in the excavation. All 5 grab soil samples of the cut & cap excavation were submitted to Origins Laboratory in Denver, Colorado for full ECMC Table 915-1 analysis. Laboratory analytical results confirm TPH and Arsenic impacts above Table 915-1 Residential Soil Screening Level limits and applicable background soil sample results exist in the north sidewall soil sample WH-SS-01@3'. On 4/5/24, the flowline removal bellhole excavations were assessed per approved SF27 document number 403293670 using visual, olfactory, and PID field screening. Staining or odor was not observed in any of the bellholes and all PID readings were within the normal range seen with native soils. Grab soil samples FL-SS-08@4', FL-SS-09@4', FL-SS-19@4', and FL-SS-20@4' collected from flowline segment end points where 2 segments of the flowline were abandoned-in-place were submitted to Origins for Table 915-1 BTEX, TPH (C6-C36), TMBs, Naphthalene, Boron, EC, pH, and SAR analysis only per approved SF27 document number 403293670. Analytical results confirm compliance with all Table 915-1 Residential Soil Screening Level limits and native soil background sample results. See attached site investigation report for all figures, tables, photos, closure checklists, and laboratory analytical reports.

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):

All excavations were backfilled and the farmer has planted his crop. Bayswater will return to the wellhead after the farmer has harvested his crop in the fall to begin excavation and removal of impacted material at WH-SS-01@3' Confirmation soil samples will be collected and submitted to Origins. Bayswater would like to request ECMC approval for a reduced analysis list of TPH (C6-C36) and Arsenic only for all confirmation soil samples going forward.

Proposed Groundwater Sampling

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

If groundwater is encountered, a grab sample will be collected and submitted to Origins for ECMC Table 915-1 Organics Compounds in Groundwater analysis.

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 9

Number of soil samples exceeding 915-1 1

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square 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

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 3

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?

Background grab soil samples were collected from 3' and 9' bgs from 2 locations in the field away from the wellhead excavation.

☐ 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?

See Proposed Sampling Plan

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.

Wellhead has been P&A'd and flowline removed with 2 segments abandoned-in-place.

REMEDATION 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.

Excavation for offsite disposal after the farmer harvests his crop in the fall.

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

_____ 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? 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? 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.

All wellhead and flowline bellhole excavations were backfilled and returned to field grade. The farmer has planted his crop. After impacted soil removal is complete in the fall, the excavation will be re-contoured and reclaimed in accordance with ECMC 1000 series rules.

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. 11/30/2024

Proposed date of completion of Reclamation. 12/13/2024

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). 04/03/2024

Proposed site investigation commencement. 04/03/2023

Proposed completion of site investigation. 04/29/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/31/2024

Proposed date of completion of Remediation. 11/30/2024

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

Form 6 document number 403705085 is related to this form. Form 44 document number 403296428 is related to this form.

Water well documents available on Colorado Division of Water Resources online database for water well receipt number 9058782 approximately 235' away from the wellhead state a static groundwater level of 39' bgs. Per ECMC Rule 915.a., operators will adhere to the concentrations for soil cleanup in Table 915-1. Operators will use Residential Soil Screening Level concentrations as cleanup levels.

Bayswater would like to request ECMC approval for a reduced analysis list of TPH (C6-C36) and Arsenic only for all confirmation soil samples going forward.

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

Signed: Brad Rogers

Title: EHS Manager

Submit Date: 05/01/2024

Email: brogers@bayswater.us

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: 05/14/2024

Remediation Project Number: 27133

COA Type**Description**

	Operator shall continue to analyze soil samples for Table 915-1 Soil TPH (C6-C36), Organic Compounds in Soils, Arsenic, and Lead.
	Operator shall submit a Form 19 Spill/Release report pursuant to Rule 912.b.(1)A. and G.
2 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**

403772589	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403772742	SITE INVESTIGATION REPORT
403790297	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)