

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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403745263

Receive Date:

04/11/2024

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 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) 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 #: 26871 Initial Form 27 Document #: 403293790

## 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 #: 017-06274	County Name: CHEYENNE
Facility Name: MULL UNIT 20	Latitude: 38.845440	Longitude: -102.890060	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 9	Twp: 14S	Range: 49W Meridian: 6 Sensitive Area? Yes

  

Facility Type: LOCATION	Facility ID: 321578	API #: _____	County Name: CHEYENNE
Facility Name: MULL UNIT-614S49W 9SENE	Latitude: 38.845440	Longitude: -102.890060	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENE	Sec: 9	Twp: 14S	Range: 49W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Cattle -- Grazing Land

Is domestic water well within 1/4 mile? Yes

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**

## 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
Yes	SOILS	approximately 100x100 area	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.

Sampling at the Mull Unit 20 WH was conducted 4/13/2023, 10/24/2023 and on 2/28/2024. After excavation, confirmation samples were collected at SP1, SP2, SP3, and SP5 on 2/28/2024. Analytical results indicate that the SP1 and SP3 are above Table 915-1 for Arsenic. Background samples (BG1) taken at 4' and 6' bgs indicate that Arsenic Local Clean-Up Levels are 4.89 mg/kg ( $1.25 \times 3.91 = 4.89$ ). Analytical results show that the confirmation samples are within the background levels for pH and Arsenic at SP2 and SP5. Further samples will need to be taken at SP1 and SP3 for Arsenic.

### 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 will be collected around the Mull Unit 20 WH at SP1 and SP3. Mull would like to request a reduced analytical suite for Arsenic 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      17

Number of soil samples exceeding 915-1      2

#### NA / ND

--      Highest concentration of TPH (mg/kg)      72.1

NA      Highest concentration of SAR

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

BTEX > 915-1 No

Approximate areal extent (square feet) 1000

Vertical Extent > 915-1 (in feet) 6

#### Groundwater

Number of groundwater samples collected 0

ND Highest concentration of Benzene (µg/l)

Was extent of groundwater contaminated delineated? No

ND Highest concentration of Toluene (µg/l)

Depth to groundwater (below ground surface, in feet) 55

NA Highest concentration of Ethylbenzene (µg/l)

Number of groundwater monitoring wells installed 0

NA Highest concentration of Xylene (µg/l)

Number of groundwater samples exceeding 915-1 0

ND 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?

Additional samples were collected at BG1 (SP6) sample location at 4' and 6' bgs on 2/28/2024. Background samples taken on 2/28/2024 indicate that local pH and Arsenic are above Table 915-1 standard. Arsenic Local Clean-Up Levels are 4.89 mg/kg (1.25 x 3.91 = 4.89).

☐ 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?

Excavation and confirmation samples will be taken at SP1 and SP3.

### 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.

All impacted soils will be excavated and removed to a permitted landfill as appropriate.

#### 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.

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

If Yes: Estimated Volume (Cubic Yards) 200

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

Natural Attenuation

Excavate and onsite remediation

Other

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

\_\_\_\_\_ 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 Status of Investigation

### 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? 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.

Reclamation shall occur at the completion of site investigation.

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. 08/31/2024

Proposed date of completion of Reclamation. 01/01/2026

## 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. \_\_\_\_\_

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/18/2023

Proposed site investigation commencement. 04/01/2023

Proposed completion of site investigation. 06/01/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/01/2024

Proposed date of completion of Remediation. 07/31/2025

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: Jessica Donahue

Title: Compliance Specialist

Submit Date: 04/11/2024

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: 05/14/2024

Remediation Project Number: 26871

**COA Type****Description**

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area
	The pH of soil samples collected at the site exceeds the allowable level for Table 915-1 soil suitability for reclamation and exceeds the background sample presented. Therefore, Operator will define the extent of soil with elevated pH, and if Operator proposes to leave soil with elevated pH in place, Operator will submit a Reclamation plan pursuant to Rule 915.b.
	Only one background sample was taken and is not enough to be statistically relevant. If Operator proposes background soil sampling, Operator shall obtain background samples from a minimum of five (5) separate locations as an initial characterization. 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.
3 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**

403745263	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403748154	SITE INVESTIGATION REPORT
403790363	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

Environmental	ECMC acknowledges the request for a reduced analyte suite and does not approve it at this time.	05/14/2024
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Total: 1 comment(s)