

State of Colorado
Energy & Carbon Management Commission

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403692116
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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: <u>MURFIN DRILLING COMPANY INC</u>	Operator No: <u>61650</u>	Phone Numbers Phone: <u>(316) 858-8664</u> Mobile: <u>()</u>
Address: <u>250 N WATER ST STE 300</u>		
City: <u>WICHITA</u>	State: <u>KS</u>	Zip: <u>67202</u>
Contact Person: <u>Cristina Goodrich</u>	Email: <u>cgoodrich@murfininc.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32761 Initial Form 27 Document #: 403571720

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: <u>WELL</u>	Facility ID: _____	API #: <u>017-06031</u>	County Name: <u>CHEYENNE</u>
Facility Name: <u>UPRR 1-1</u>	Latitude: <u>38.689281</u>	Longitude: <u>-102.408843</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>1</u>	Twp: <u>16S</u>	Range: <u>45W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>321546</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>UPRR-616S45W 1SWSE</u>	Latitude: <u>38.689281</u>	Longitude: <u>-102.408843</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>1</u>	Twp: <u>16S</u>	Range: <u>45W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: OFF-LOCATION FLOWLINE Facility ID: 461952 API #: _____ County Name: CHEYENNE
Facility Name: LOWE-616S45W 12NENW Latitude: 38.682260 Longitude: -102.411330
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NENW Sec: 12 Twp: 16S Range: 45W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 486305 API #: _____ County Name: CHEYENNE
Facility Name: UPRR 1-1 Wellhead Latitude: 38.689281 Longitude: -102.408843
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: SWSE Sec: 1 Twp: 16S Range: 45W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

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

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

The location is within Lesser Prairie Chicken Estimated Occupied Range.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" 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 type="checkbox"/> 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	9'x9'x7'	sampling and 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.

Wellhead cut and cap operations were completed at the UPRR 1-1 wellhead on 2/27/24. Visual inspection and field screening of soils around the well and associated pumping equipment was conducted following wellhead cut and cap and facility decommission operations. Grab soil samples WH-B01@7' and WH-W01@6' were submitted for laboratory analysis to determine if a release occurred. The associated flowline will now be abandoned in place. Grab soil sample FL-B01@5' was collected from the location where the flowline riser was disconnected at the wellhead and submitted for laboratory analysis to determine if a release occurred. Laboratory analytical results confirm concentrations of TPH (C6-C36), EC, and SAR exceed ECMC Table 915-1 Residential Soil Screening Level limits at the former wellhead location. Approved Form 19-Initial/Supplemental document number 403724970 was submitted on 3/20/24. See attached site investigation report for all figures, tables, photos, closure checklists, and laboratory analytical reports for assessment work completed to-date.

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):

On 3/18/24, historical soil impacts were confirmed following wellhead cut & cap operations at the UPRR 1-1 wellhead. Excavation and confirmation soil sampling activities are planned to begin after Lesser Prairie Chicken HPH protection ends on 7/19/24. Murfin would like to request ECMC approval for a reduced soil confirmation sample analysis of TPH (C6-C36), EC, and SAR only at the wellhead excavation. Tank battery and flowline Initial assessment is still needed once the tank battery is decommissioned. Grab soil sample and field screen assessments will be completed per approved IF27 document number 403571720.

Proposed Groundwater Sampling

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

Groundwater has not been encountered. If groundwater is encountered, a grab sample will be collected and analyzed for Table 915-1 Organic Compounds in Groundwater and Groundwater Inorganic Parameters.

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):

The tank battery and flowlines associated with this remediation project still need to be decommissioned. Field personnel will field screen all disturbed areas using a photoionization detector to determine if laboratory confirmation soil sampling is required.

On 2/27/24, visual inspection and field screening of soils was conducted at four sidewall locations within the wellhead excavation area and four locations at the ground surface adjacent to the wellhead excavation. Based on the inspection and screening results, no soil samples were submitted from these areas in accordance with ECMC Operator Guidance.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 3
Number of soil samples exceeding 915-1 3
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 81

NA / ND

-- Highest concentration of TPH (mg/kg) 11634
-- Highest concentration of SAR 20.6
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 7

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
0 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?

On 1/4/24 background grab soil samples BG02@3', BG-02@6', and BG-02@9' were collected from native material adjacent to the wellhead cut and cap excavation. The background soil samples were submitted for laboratory analysis of the Table 915-1 Soil Suitability for Reclamation and Metals. Additional background samples may be collected.

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.

Well has been P&A'd.

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.

Excavation for offsite disposal is planned.

Soil Remediation Summary

In Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

Ex Situ

- _____ Excavate and offsite disposal
- _____ 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 Progress Report

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.

Murfin is adequately bonded as shown by submitted Form 3A Doc: 403418364 and has General Liability insurance.

Operator anticipates the remaining cost for this project to be: \$ 10000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

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 will be completed in accordance with ECMC 1000 Series Rules or as agreed upon with the Surface Owner.

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. _____

Proposed date of completion of Reclamation. _____

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. 03/20/2024

Actual Spill or Release date, or date of discovery. 03/19/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/27/2024

Proposed site investigation commencement. 02/27/2024

Proposed completion of site investigation. 09/30/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/22/2024

Proposed date of completion of Remediation. 09/30/2024

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

Due to this location being within Lesser Prairie Chicken High Priority Habitat (active March 1 - July 19), planned excavation and assessment activities are currently on hold.

Form 6 document number 403496058 is related to this form.

Form 42 document number 403664618 is related to this form.

The flowline is now to be abandoned in place. Form 44 document number 403563960 is related to this form.

Water well documents available on Colorado Division of Water Resources online database for water well receipt number 9076218 approximately 2 miles NW from the wellhead state a static groundwater level of 272' 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.

Based on wellhead cut & cap excavation assessment analytical results compared to ECMC Table 915-1 Residential Soil Screening Level limits, Murfin would like to request ECMC approval for a reduced soil confirmation sample analysis of TPH (C6-C36), EC, and SAR only at the wellhead excavation.

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

Signed: David Castro

Title: Senior Project Scientist

Submit Date: 05/02/2024

Email: dcastro@eagle-enviro.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: 05/28/2024

Remediation Project Number: 32761

COA Type**Description**

	ECMC approves the reduced analyte request for the Wellhead Excavation, Operator shall sample for TPH (C6-C36), EC, SAR and Arsenic.
	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 and are greater than 1.25 times the arsenic concentration in the background sample. Operator will provide additional data to characterize arsenic concentrations at the site and to determine its source.
	Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2). for Flowline abandonment. Attached Form 44 is for Flowline Removal. If the Operator proposes the abandonment in place of an off-location flowline(s), a Pre-abandonment notice in the form of a Form 44 is required per ECMC Rule 1105.d.(3).
	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.
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
403692116	FORM 27-SUPPLEMENTAL-SUBMITTED
403777028	SITE INVESTIGATION REPORT

Total Attach: 2 Files

Date Run: 5/28/2024 Doc [#403692116]

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General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)