

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

403728758

Receive Date:

04/03/2024

Report taken by:

Krystal Heibel

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: IMPETRO RESOURCES LLC	Operator No: 10690	Phone Numbers Phone: (361) 935-5633 Mobile: ()
Address: 558 CASTLE PINES PKWY UNIT B-4		
City: CASTLE PINES	State: CO Zip: 80108	
Contact Person: Brent Bongers	Email: bbongers@impetroresources.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 8067 Initial Form 27 Document #: 2313003

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: SKIM PIT CLOSURE

SITE INFORMATION

No Multiple Facilities

Facility Type: PIT	Facility ID: 101966	API #:	County Name: WASHINGTON
Facility Name: GETTMAN	Latitude: 39.960206	Longitude: -103.509208	
** correct Lat/Long if needed: Latitude: 39.958799		Longitude: -103.509319	
QtrQtr: SESW	Sec: 14	Twp: 1S	Range: 55W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications OL Most Sensitive Adjacent Land Use Residential

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

Nearest static groundwater level measured at 45 feet bgs on May 21, 1974 (Domestic Water Well Permit #74201)
The location is not within any registered High Priority Habitats

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	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.

"DUG UP SKIM PIT, STOCKPILE SOIL, TEST AND BACKFILL. THE ORIGINAL SKIM PIT WAS ACTUALLY A CULVERT WITH A CONCRETE BOTTOM. REPLACED IT WITH A TANK. THERE WAS NO STAINING. CURRENTLY, THE LEASE IS BEING EVALUATED FOR P&A. IF WE DECIDE TO CONTINUE PUMPING WE CAN EXCAVATE THE SIDE OF THE TANK, OTHERWISE, WE WILL BE DIGGING IT OUT. WILL MAKE A DECISION BY JULY 21." This description was provided by the previous operator, Alfred Ward & Son (Operator #94300), on the most recent Form 27-S (Doc #402658626) for the remediation project. The Gettman 14-14 well and associated tank battery were acquired by Impetro Resources, LLC (Operator #10690) in July 2023, who will be putting the lease back into production. Impetro has been unable to determine or identify detailed investigation and/or remediation activities that were performed by the previous operator, beyond the historical information submitted in the documents uploaded to the ECMC database. This form is being submitted to propose investigation activities regarding the former skim pit that was replaced with a partially buried concrete vault circa 2013-2014.

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):

Four confirmation soil samples shall be collected from the area around the former skim pit near the current concrete vault and submitted to a NELAP-accredited laboratory for the Table 915-1 analysis. Additionally, three background soil samples will be collected from similar depths and soil horizons as confirmation soil samples and submitted for Table 915-1 analyses. Based on the depth to groundwater indicated by the nearest permitted well, Impetro is requesting the use of residential soil screening levels.

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

Number of soil samples collected 0

Number of soil samples exceeding 915-1

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

Approximate areal extent (square feet)

NA / ND

Highest concentration of TPH (mg/kg)

Highest concentration of SAR

BTEX > 915-1

Vertical Extent > 915-1 (in feet)

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

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?

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

Volume of solid waste (cubic yards) 53

Volume of liquid waste (barrels) 0

☒ Is further site investigation required?

Four confirmation soil samples shall be collected from the former skim pit/ around the concrete vault and submitted to a NELAP-accredited laboratory for the Table 915-1 analysis. Additionally, three background soil samples will be collected from similar depths and soil horizons as confirmation soil samples and submitted for Table 915-1 analyses. Based on the depth to groundwater indicated by the nearest permitted well, Impetro is requesting the use of residential soil screening levels.

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.

Based on comments in the most recent Form 27-S, the previous operator installed a brown water tank prior to the open pit. Impetro has been unable to determine or identify detailed investigation and/or remediation activities that were performed by the previous operator, beyond the historical information submitted in the documents uploaded to the ECMC database.

REMEDIAL ACTION 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.

Pit (vertical culvert with concrete bottom) was excavated and removed. This description was provided by the previous operator. However, Impetro has been unable to determine or identify any confirmation soil sampling was performed.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

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

Yes _____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____ 53
_____ 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 Update for change of operator and compliance

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 carries general liability insurance of \$1,000,000.00 per occurrence and \$4,000,000.00 in excess. Operator carries \$25,000.00 blanket surface surety bond.

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 and/or interim reclamation activities will be evaluated and presented to the CECMC for approval subsequent to additional investigation activities or successful remediation

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. _____

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. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/15/2017

Proposed site investigation commencement. 07/15/2024

Proposed completion of site investigation. 09/15/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/15/2024

Proposed date of completion of Remediation. 10/15/2024

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

Per the COA on Form 27 #403646420, Three Form 15s were submitted to update records for the the two produced water pits at this Facility (Doc# 403737747 and Doc# 403741363) and update the lat/long location of the former skim pit (Doc# 403651827). Note: Current Google Maps imagery is from ~2016 when soil was still stockpiled on location.

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

Signed: Drezden Kinnaird

Title: Consultant

Submit Date: 04/03/2024

Email: dkinnaird@cgrs.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: Krystal Heibel

Date: 06/12/2024

Remediation Project Number: 8067

COA Type**Description**

	Per Doc# 403646420, Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.
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.

Att Doc Num**Name**

403728758	FORM 27-SUPPLEMENTAL-SUBMITTED
403741879	SITE MAP
403741883	SOIL SAMPLE LOCATION MAP
403741886	DISPOSAL MANIFESTS

Total Attach: 4 Files

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

Environmental	"Per the COA on Form 27 #403646420, Three Form 15s were submitted to update records for the the two produced water pits at this Facility (Doc# 403737747 and Doc# 403741363) and update the lat/long location of the former skim pit (Doc# 403651827). Note: Current Google Maps imagery is from ~2016 when soil was still stockpiled on location."	06/12/2024
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Total: 1 comment(s)