

State of Colorado
Energy & Carbon Management Commission

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403794171
Receive Date:
05/17/2024
Report taken by:
KRIS NEIDEL

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>ROBERT L BAYLESS PRODUCER LLC</u>	Operator No: <u>6720</u>	Phone Numbers
Address: <u>621 17TH ST STE 2300</u>		Phone: <u>(505) 564-7801</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80293</u>		Mobile: <u>(505) 330-2593</u>
Contact Person: <u>Helen Trujillo</u>	Email: <u>notices@rlbayless.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30484 Initial Form 27 Document #: 403436324

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: Rule 911. Closure of oil and gas facilities

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>117433</u>	API #: _____	County Name: <u>ROUTT</u>
Facility Name: <u>EITLES-BRADLEY 1-14</u>	Latitude: <u>40.482962</u>	Longitude: <u>-107.110704</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>14</u>	Twp: <u>6N</u>	Range: <u>87W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>107-06142</u>	County Name: <u>ROUTT</u>
Facility Name: <u>EILTS-BRADLEY 1-14</u>	Latitude: <u>40.482740</u>	Longitude: <u>-107.111020</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>14</u>	Twp: <u>6N</u>	Range: <u>87W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: LOCATION Facility ID: 316765 API #: County Name: ROUTT
Facility Name: ELTS-BRADLEY-66N87W 14NENE Latitude: 40.482651 Longitude: -107.111035
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NENE Sec: 14 Twp: 6N Range: 87W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use location on private ranch
Is domestic water well within 1/4 mile? No 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

Yampa River is approximately 762 feet to the northwest directly downhill of the wellsite.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input 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 checked="" type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	UNDETERMINED	Soil Sampling

INITIAL ACTION SUMMARY

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

RECENTLY P&A'D WELL SITE. WILL PERFORM SOILS TESTING TO ENSURE COMPLIANT WITH TABLE 915-1.

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):

See attached Soil Sampling Plan.

UPDATE 5/17/24: In Aug 2023 samples were collected from site using an excavator. Impacts were noted under tank battery, wellhead, and production pit. These results were submitted on a previous Supplemental Form 27, Doc# 403550560. Impacted areas will be excavated to remove contaminated soils. During excavation, extent of impacts will be delineated using field screening instruments. Once field screening concentrations are below 50 ppm, soil samples will be collected from bottoms and lateral boundaries of excavation to be sent to the lab to ensure Table 915-1 compliance.

Proposed Groundwater Sampling

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

Encountering groundwater is not anticipated at this time. If at any point in this remediation process groundwater is encountered, it will be sampled for Table 915-1 constituents, reported, and the project parameters will be reevaluated to incorporate groundwater considerations.

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):

Further excavation will take place to delineate and remove impacts. Field screening instruments will be used to help determine the extent of impacts and ensure cleanup.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 6

_____ Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 4

_____ Highest concentration of SAR _____

BTEX > 915-1

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

No

Approximate areal extent (square feet) 32500

Vertical Extent > 915-1 (in feet) 0

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?

Three background samples were collected from nearby off-pad locations. Additional background samples may be collected for further evaluation of Arsenic levels.

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?

Impacted areas will be excavated to remove contaminated soils. During excavation, extent of impacts will be delineated using field screening instruments. Once field screening concentrations are below 50 ppm, soil samples will be collected from bottoms and lateral boundaries of excavation to be sent to the lab to ensure Table 915-1 compliance.

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.

Impacted soil will be excavated and hauled to Twin Enviro Services facility for disposal.

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.

Impacted areas will be excavated to remove contaminated soils. During excavation, extent of impacts will be delineated using field screening instruments. Once field screening concentrations are below 50 ppm, soil samples will be collected from bottoms and lateral boundaries of excavation to be sent to the lab to ensure Table 915-1 compliance.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Yes Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) 80

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or ECMC Facility ID # 0

_____ 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
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.

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 Removal of impacted soil and confirmation testing

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's general liability insurance is provided by Berkley National Insurance Company, Certificate # 971124807, Doc# 2415276
For financial assurance, please see approved Form 3A, Doc# 403504554

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

WASTE DISPOSAL INFORMATION

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

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

N/A

Volume of E&P Waste (solid) in cubic yards 80

E&P waste (solid) description Equipment was removed during P&A; impacted soil was revealed

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: Twin Enviro Services

Volume of E&P Waste (liquid) in barrels 0

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 Plan was proposed in submittal of Form 27 Doc# 403550560. The reclamation will proceed only after resolution of REM# 30484. Any excavation occurring during remediation will be backfilled

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. 09/02/2024

Proposed date of completion of Reclamation. 09/27/2024

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). 07/05/2023

Proposed site investigation commencement. 06/26/2023

Proposed completion of site investigation. 08/03/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/15/2024

Proposed date of completion of Remediation. 07/17/2024

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

Please forward to Kris Neidel.

This Supplemental Form 27 is being submitted to detail and propose remediation activities following site investigations conducted 8/3/23. For results pertaining to initial investigation, please refer to Doc# 403550560 and related attachments. All remaining pipeline & riser will be removed as part of the next steps of this remediation.

Remediation of impacted soils at the Eilts Bradley 1-14 location and associated pit (FacID 117433) will be accomplished with excavation and disposal of contaminated soil at Twin Enviro Services landfill. During excavation, consultant staff will be on site with field screening equipment. Lateral boundaries and centers of any excavation area will be field screened until soils are below a threshold of 50 ppm. Once adequate depth and horizontal extent are reached to ensure impacts are removed, a soil sample will be collected from each sidewall and base for analysis of Table 915-1. Excavations will be backfilled with clean soils. Please see attached map for estimated excavation areas, and tentative sample locations.

The schedule outlined in this form is estimated and subject to change based on excavator availability. ECMC Environmental Staff Kris Neidel will be notified by phone 72 hrs prior to commencement of work.

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

Signed: Joel Adams HRL Compliance

Title: Environmental Scientist

Submit Date: 05/17/2024

Email: jadams@hrlcomp.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: KRIS NEIDEL

Date: 06/12/2024

Remediation Project Number: 30484

COA Type

Description

	Conditions of approval from previous approved forms remain valid.
	The number of soil samples and location should be adequate to characterize the excavated area.
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

403794171	FORM 27-SUPPLEMENTAL-SUBMITTED
403795504	MAP

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

Environmental	It is understood that delineation is by excavation. It may benefit the operator to delineate first.	06/12/2024
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Total: 1 comment(s)