

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

403853617

Receive Date:

07/14/2024

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 ECOM 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: POC-I LLC	Operator No: 10386	Phone Numbers
Address: P.O. BOX 51208		Phone: (307) 7466468
City: CASPER	State: WY Zip: 82605	Mobile: (307) 7466468
Contact Person: Rebecca Podio	Email: rpodio@gmail.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34712 Initial Form 27 Document #: 403725429

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

No Multiple Facilities

Facility Type: TANK BATTERY	Facility ID: 480890	API #: _____	County Name: MOFFAT
Facility Name: Iles Dome Tank Battery	Latitude: 40.306138	Longitude: -107.688780	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SWNW	Sec: 23	Twp: 4N	Range: 92W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications OH Most Sensitive Adjacent Land Use Agriculture

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? Yes

SITE INVESTIGATION PLAN

TYPE OF WASTE:☒ **E&P Waste** ☐ **Other E&P Waste** ☒ **Non-E&P Waste**☒ Produced Water☐ Workover Fluids

Cement

☒ 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	Unknown	Will sample exposed area once structure is removed

INITIAL ACTION SUMMARY

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

The large cement sump/pit, which has been integral to the field's operations for years, may present a potential environmental hazard. The decision to decommission and remove this structure is motivated by the need to eliminate possible sources of contamination, adhere to environmental regulations, and optimize the field's design and functionality layout for future operational improvements.

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):

Samples of the soil around the structure of the cement pit will be taken once the structure is removed.

Proposed Groundwater Sampling

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

Groundwater samples will be taken from the monitor wells near the cement pit.

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

NA / ND

Number of soil samples collected 0

Number of soil samples exceeding 915-1

Was the areal and vertical extent of soil contamination delineated?

Approximate areal extent (square feet)

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)

Volume of liquid waste (barrels)

☒ Is further site investigation required?

Soil sampling will occur after the cement sump/pit has been removed.

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.

The structure of the cement pit will be removed using heavy equipment, and the material removed will be disposed of properly. Any contaminated soil that is discovered after the pit structure is removed will also be removed using heavy equipment.

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.

The structure of the cement pit will be removed using heavy equipment, and the material removed will be disposed of properly. Any contaminated soil that is discovered after the pit structure is removed will also be removed using heavy equipment.

Soil Remediation Summary

☐ In Situ

☒ Ex Situ

Bioremediation (or enhanced bioremediation)

Yes Excavate and offsite disposal

Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 100

Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC Facility ID #

_____ Natural Attenuation
_____ Other _____

_____ No 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?

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.

The site of the cement pit will be backfilled, compacted, and leveled. It will be covered with gravel, and new production equipment will be placed where the cement pit was to expand the treatment capacity of the tank battery without adding additional disturbance.

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. _____

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/01/2024

Proposed site investigation commencement. 05/15/2024

Proposed completion of site investigation. 05/20/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/01/2024

Proposed date of completion of Remediation. 08/01/2024

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

Denied 07/15/2024

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

Signed: Rebecca Podio

Title: Petroleum Engineer

Submit Date: 07/14/2024

Email: rpodio@gmail.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:

Date:

Remediation Project Number: 34712

COA Type**Description**

0 COA	
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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**

403853617	FORM 27 DENIED
403853618	OTHER
403855466	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

Environmental	MSDS for solvents used in cleaning the cement vault structure shall be submitted to ECMC. In addition to the Table 915-1 Cleanup Concentration Contaminants of Concern, solvents used for cleaning the cement vault structure shall be identified and sampled as additional contaminants of concern in the delineation of potential impacts.	07/15/2024
Environmental	Operator has not complied with COAs on Supplemental F27 Doc #403807646. It is stated, "Samples of the soil around the structure of the cement pit will be taken once the structure is removed." A sampling plan shall be submitted for review that identifies sample locations.	07/15/2024
Environmental	Operator has not complied with COAs on Supplemental F27 Doc #403807646. Provide the corrected lat/long for the concrete structure on a Supplemental F27	07/15/2024
Environmental	Operator has not complied with COAs on Supplemental F27 Doc #403807646. It is stated, "We are pleased to announce that work officially started in mid-May. On May 28, 2024, our primary contractors visited the site to finalize the detailed plan for removing the cement pit. During this visit, necessary pit sampling was conducted." Operator shall provide a map with each sample point. Additionally, the lat/long, depth of sample(s), physical description, photo documentation, and screening for each sample collected. It appears that Operator is dismissing that sampling was performed on or about May 28, 2024, as stated in the Supplemental F27.	07/15/2024

Environmental	KRIS- YOU CAN DENY OR PUSH BACK TO DRAFT FOR THE FOLLOWING REASONS: Operator has not complied with COAs on Initial F27 Doc #403725429. Operator did not complete the Adequacy of Operator's General Liability Insurance and Financial Assurance.	07/15/2024
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Total: 5 comment(s)

