

State of Colorado
Energy & Carbon Management Commission

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403885596
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09/18/2024

Report taken by:
Chris Sanchez

Site Investigation and Remediation Workplan (Initial 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>P O & G OPERATING LLC</u>	Operator No: <u>10634</u>	Phone Numbers Phone: <u>(713) 5898186</u> Mobile: <u>()</u>
Address: <u>5847 SAN FELIPE SUITE 3200</u>		
City: <u>HOUSTON</u>	State: <u>TX</u>	Zip: <u>77057</u>
Contact Person: <u>Charlotte Nash</u>	Email: <u>charlotte_nash@pogresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37081 Initial Form 27 Document #: 403885596

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>017-07507</u>	County Name: <u>CHEYENNE</u>
Facility Name: <u>DOLFI 1-35</u>	Latitude: <u>38.698240</u>	Longitude: <u>-102.420850</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>35</u>	Twp: <u>15S</u>	Range: <u>45W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>321931</u>	API #: _____	County Name: <u>CHEYENNE</u>
Facility Name: <u>DOLFI-615S45W 35SWSW</u>	Latitude: <u>38.698178</u>	Longitude: <u>-102.420885</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>35</u>	Twp: <u>15S</u>	Range: <u>45W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: FLOWLINE SYSTEM	Facility ID: 481680	API #:	County Name: CHEYENNE
Facility Name: POG System	Latitude: 38.951444	Longitude: -102.368865	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWNW	Sec: 5	Twp: 13S	Range: 44W
		Meridian: 6	Sensitive Area? Yes

SITE CONDITIONS

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

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

NRCS Soil Type: Colby silt loam, 1 to 4 percent slopes, eroded
 Nearest constructed water well is approximately 5760' Northwest from the wellhead. Permit #60640. Drilled to depth of 295'.
 Closest RBU is approximately 6100 feet northwest from the wellhead.
 Location is within HPH for Lesser Prairie Chicken Estimated Occupied Range per Rule 309.e.1 Other Consultation 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	GROUNDWATER	NA	Lab analysis if encountered
UNDETERMINED	SOILS	NA	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.

The Dolfi 1-35 wellhead and associated off-location flowline will be assessed per ECMC Rule 911.a., soil and groundwater (if present) samples will be collected and submitted for laboratory analysis to determine if concentrations and values are in compliance with ECMC Table 915-1. Visual inspection and field screening of soils around the WH and associated FL will be conducted during sampling activities. The Topographic Site Location Map showing the geographic setting of the site is provided.

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):

Following the wellhead cut and cap operations, soil will be field screened at the wellhead excavation and adjacent to the flowline endpoint riser. Samples will be collected if indications of impacts to soil or groundwater are present. If impacted soils are encountered, a soil sample will be collected from the area exhibiting the highest degree of impact based on visual, olfactory, and/or field screening observations. In the absence of apparent impacts, a soil sample will be collected from the base of the excavation adjacent to the wellhead, adjacent to the separator riser, and the areas most likely to have been impacted during the operational life of the flowline. Soil samples will be submitted to an accredited laboratory for analysis using standard methods appropriate for detecting the target analytes in ECMC Table 915-1. Proposed soil sample and screening locations are provided.

Proposed Groundwater Sampling

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

If groundwater is encountered during facility decommissioning activities, a minimum of one grab sample will be collected. Groundwater samples will be submitted to an accredited laboratory for target analytes in ECMC Table 915-1.

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 Dolfi 1-35 off-location flowline has a passed integrity flowline test, submitted on Form 44 doc #403771854. Per Rule 913.h, soil samples will be collected from the areas most likely to have been impacted during the operational life of the flowline. Flowline will be field screened utilizing a PID every 250 feet. If there are indications of impacts, soil samples will be submitted for analysis.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected _____ 0

_____ Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 _____

_____ Highest concentration of SAR _____

Was the areal and vertical extent of soil contamination delineated? _____

_____ BTEX > 915-1 _____

Approximate areal extent (square feet) _____

_____ Vertical Extent > 915-1 (in feet) _____

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?

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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

NA _____

REMEDIAL 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.

NA _____

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____

_____ 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

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 90 days after receipt of analytical

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.

PO&G has complied with General Liability Insurance requirements per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation. This is the initial assessment for WH/FL closure the costs represent the estimated cost for labor and analytical samples.

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: _____

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 oil and gas location where this well is located is a single well pad. The offsite location, where the tank battery is located, will be closed and remediated as part of a separate remediation ID. 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? 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. 09/01/2024

Proposed date of completion of Reclamation. 12/01/2024

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. 06/01/2024

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/12/2024

Proposed site investigation commencement. 09/01/2024

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/01/2024

Proposed date of completion of Remediation. _____

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

The oil and gas location where this well is located is a single well pad. The offsite location, where the tank battery is located, will be closed as part of a different remediation project. This reclamation is for the wellsite location only.

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

Signed: Jessica Donahue

Title: Environmental Compliance

Submit Date: 09/18/2024

Email: jdonahue@ardorenvironmental.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECOMC Rules and applicable orders and is hereby approved.

ECMC Approved: Chris Sanchez

Date: 09/30/2024

Remediation Project Number: 37081

COA Type**Description**

	If impacted soils are encountered during facility decommissioning, the impacted soil will be segregated for proper offsite disposal and the lateral and vertical extent of impacts shall be determined with appropriate confirmation soil sampling
	Operator shall submit the next Supplemental Form 27 with all available analytical results no later than 90 days after the well cut and cap date.
	Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2). for Flowline abandonment. Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the Flowlines. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater
	If encountered operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to the Organic Compounds
	Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
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**

403885596	FORM 27-INITIAL-SUBMITTED
403925371	SITE MAP
403925372	SOIL SAMPLE LOCATION MAP

Total Attach: 3 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)