

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Alexander Ahmadian

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 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: PROVIDENCE OPERATING LLC DBA POCO OPERATING	Operator No: 10694	Phone Numbers
Address: 16400 DALLAS PARKWAY SUITE 400		Phone: (720) 256-8774
City: DALLAS State: TX Zip: 75428		Mobile: ()
Contact Person: Meghan Grimes	Email: mgrimes@providence-energy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37119 Initial Form 27 Document #: 403923902

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: WELL	Facility ID: _____	API #: 001-09470	County Name: ADAMS
Facility Name: KALLSEN 1-10	Latitude: 39.983184	Longitude: -104.654830	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: CNW	Sec: 10	Twp: 1S	Range: 65W Meridian: 6 Sensitive Area? No

Facility Type: LOCATION	Facility ID: 320495	API #: _____	County Name: ADAMS
Facility Name: GREAT WESTERN KALLSEN 1-10	Latitude: 39.983060	Longitude: -104.654824	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: CNW	Sec: 10	Twp: 1S	Range: 65W Meridian: 6 Sensitive Area? No

Facility Type: OFF-LOCATION FLOWLINE Facility ID: 475893 API #: _____ County Name: ADAMS
Facility Name: Wellhead Line 1-10 Latitude: 39.972547 Longitude: -104.654608
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: SWSW Sec: 10 Twp: 1S Range: 65W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

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

Is domestic water well within 1/4 mile? Yes 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

There are multiple RBUs within 2000' of the location.
A receptors map is included with this Form as an attachment.
Based on nearby constructed groundwater monitoring wells (Permit 2074-F) groundwater is >20' bgs (50').

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 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	SOILS	Unknown	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.

In accordance with ECMC Rule 911, this form serves as notification for the decommissioning and abandonment of the KALLSEN #1-10 Wellhead and associated off-location flowline. Soils surrounding and beneath production equipment will be visually inspected during decommissioning activities and confirmation soil sampling will be conducted to assess potential hydrocarbon impacts. The off location flowline (Facility ID #475893) will be abandoned in place per the surface owner agreement attached to this Form and Form 44 Doc #403812572.

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):

Soil will be field screened at the wellhead and along the associated flowline. Samples will be collected if indications of impacts to soil or groundwater are present. If impacted soils are encountered, a waste-characterization sample will be collected from the areas exhibiting the highest degree of impact based on visual, olfactory, and field screening. In the absence of apparent impacts, a soil sample will be collected adjacent to the wellhead and along the flowline from areas most likely to have been impacted during the operational life of the flowline including where the flowline connects to equipment, where the flowline was repaired in the past, and at joints and hammer unions. Soil samples will be submitted to a NELAP accredited laboratory for analysis using standard methods appropriate for detecting the target analytes in the CECMC Table 915-1. Based on the depth to groundwater in permitted well 2074-F (50' bgs), POCO 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):

If groundwater is encountered, operator will analyze groundwater samples for the Table 915-1 groundwater inorganic parameters and organic compounds in groundwater.

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

_____ 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?

Background samples will be collected as part of the investigation soil sampling activities proposed and will include multiple locations sufficiently outside of oil and gas operations and at similar depths and horizons as investigation samples collected on-site. Background samples will be submitted for the Table 915-1 list of soil suitability analytes and metals.

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.

Any hydrocarbon impacted material will be transported off-site to a licensed disposal facility in accordance with Rules 905 and 906.

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.

If reportable hydrocarbon impacts, as defined in Rule 912.b., are discovered, a site-specific remediation plan will be developed and submitted via a Supplemental Form 27. If reportable impacts are not encountered, a Supplemental Form 27 closure request will be submitted within 90 days of abandonment and/or decommissioning activities

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

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 Facility Closure

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 Option 1 Financial Assurance Plan was approved on August 14, 2023, and operator's general liability insurance coverage meets ECMC requirements.

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

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 well on the location has been plugged and abandoned per the approved Form 6. Once all equipment is removed, any road base will also be removed and disposed of at an appropriate facility. Then the disturbed area and access road will be re-contoured and seeded. Then the the location will be mulched and crimped.

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. 01/01/2025

Proposed date of completion of Reclamation. 06/30/2025

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). 01/28/2024

Proposed site investigation commencement. 10/01/2024

Proposed completion of site investigation. 11/30/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/30/2024

Proposed date of completion of Remediation. 12/31/2024

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 COA #3 on F27 Doc#403818628, "Operator shall submit the results of annual or triannual pressure tests done during the prior 12-months pursuant to Rules 1104.e and 1104.f." The well was plugged in 2023. The most current pressure tests are from 2022 and have been submitted as an attachment to Form 44 Doc #403812572.

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: 09/20/2024

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: Alexander Ahmadian

Date: 10/01/2024

Remediation Project Number: 37119

COA Type**Description**

	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. 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)).
	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 flowline. 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.
	Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2). for Flowline abandonment. Should a portion of the flowline be abandoned in place due to field constraints the Operator shall collect soil samples at the start and end point of the abandoned portion and confirm the presence or absence of impacts adjacent to the abandoned flowline section. These samples can be collected via hand auger to minimize surface disturbance.
3 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**

403923902	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403924138	SITE MAP
403924139	SITE INVESTIGATION PLAN
403924147	SURFACE USE AGREEMENT
403941917	FORM 27-INITIAL-SUBMITTED

Total Attach: 5 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)