

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403900160
Receive Date:
08/30/2024
Report taken by:
KRIS NEIDEL

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>FULCRUM ENERGY OPERATING LLC</u>	Operator No: <u>10805</u>	Phone Numbers
Address: <u>240 SAINT PAUL STREET SUITE 502</u>		Phone: <u>(970) 896-5665</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80206</u>		Mobile: <u>()</u>
Contact Person: <u>Rikki Ross</u>	Email: <u>rikki.ross@fulcrumeo.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37145 Initial Form 27 Document #: 403900160

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: Tank removal from battery.

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>486929</u>	API #: _____	County Name: <u>JACKSON</u>
Facility Name: <u>Rabbit Ears 0681 Tank Battery 486929</u>	Latitude: <u>40.476817</u>	Longitude: <u>-106.453759</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>23</u>	Twp: <u>6N</u>	Range: <u>81W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications GM Most Sensitive Adjacent Land Use Rangeland / surface water
 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

Surface water: Damfino ditch is approximately 195 feet northwest of the location but is currently Abandoned. Grizzly Creek is approximately 640 feet northwest of the location.
Wetlands: An area with wetland characteristics is located 116 feet north-northwest of the location.
Water Wells: None.
Springs: None.
Occupied Building: None.
Livestock: Location is within rangeland.
High Priority Habitats: The location resides within the Greater Sage Grouse General Habitat Management Area High Priority Habitat (HPH). Aquatic Sportfish Management Waters boundary HPH is approximately 50 feet northwest of the location. Greater Sage Grouse Undesignated HPH is approximately 331 feet southeast and 410 feet northwest of the location. Greater Sage Grouse Priority Habitat Management Area HPH is approximately 675 feet southeast of the location.

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) There is no waste associated with the tank removal.

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	SOILS	None	Visual observations

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 Q1 of 2023, 2 oil tanks were removed and relocated to the Surprise Unit CTB for site expansion. In Q3 of 2023, 1 oil tank and 2 water tanks were removed and relocated to the Surprise Unit CTB for site expansion (Attachment A). The containment liner was not compromised during removal so soil screening and sampling, at the time of removal(s), was not justified. Currently, the liner is in good condition with no holes, rips, or any signs of degradation (Attachment B). There are no historic spills, liner repairs, or correctives actions from inspections involving the removed tanks. The site is currently shut-in with plans to produce in the future so site remediation/reclamation will not be occurring at this time.

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 samples were not collected at the time of tank removals as visual screening confirmed tank liners were and are not compromised.

Proposed Groundwater Sampling

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

Groundwater samples were not collected at the time of tank removals as it was not encountered.

Proposed Surface Water Sampling

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

Surface water samples were not collected at the time of tank removals as it was not encountered.

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Further investigations are not justified at the location.

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?
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) Volume of liquid waste (barrels)

Is further site investigation required?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

No remediation required.

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.

No remediation required.

Soil Remediation Summary

In Situ Ex Situ

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

_____ Excavate and offsite disposal
If Yes: Estimated Volume (Cubic Yards) _____
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

Upon decommissioning of this location, Fulcrum will follow ECMC 913.c.(9). reporting rules.

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: _____

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 is not warranted currently as the location is still in operation. Upon site decommissioning, reclamation will be performed as required by ECMC 1000 Series Rules.

Is the described reclamation complete? _____

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). 01/01/2023

Proposed site investigation commencement. 06/06/2023

Proposed completion of site investigation. 08/27/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/06/2024

Proposed date of completion of Remediation. 08/27/2024

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

The ECMC denied the previous Form 27 Initial (Doc# 403809506) with COAs to provide additional information concerning the historic removal of tanks from the existing onsite tank battery. This Form 27 Initial is submitted as a response.

The location of the removed 109-hp Arrow A90TA generator (AIRS ID 057-0053-005, Serial Number SES90TA-G-021) for the Sundry Doc #403370614 for Fulcrum Energy (D90 Energy) (submitted on 4/11/2023 and approved on 4/13/2023) is shown in Attachment A.

No soil impacts exist onsite and remediation is not justified. Upon site decommissioning, Fulcrum will follow ECMC 900 Series Rules. Fulcrum is respectfully requesting closure of this Form 27.

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

Signed: Joel Mason

Title: Agent

Submit Date: 08/30/2024

Email: joel.mason@absarokasolutions.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: 10/02/2024

Remediation Project Number: 37145

COA Type

Description

	Soil samples shall be collected below the area where the generator was removed. Once demonstration that soils are compliant at the generator, that part of that pad shall not be used for setting production equipment.
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

403900160	FORM 27-INITIAL-SUBMITTED
403902683	SITE MAP
403907196	PHOTO DOCUMENTATION

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

Environmental	Information provided on tank removal is adequate.	10/02/2024
Environmental	It is stated that a generator was removed from the location. The generator is not identified on the attached figure.	10/02/2024

Total: 2 comment(s)