

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403902932  
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 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: <u>FULCRUM ENERGY OPERATING LLC</u>	Operator No: <u>10805</u>	<b>Phone Numbers</b>
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 #: 37147 Initial Form 27 Document #: 403902932

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>486943</u>	API #: _____	County Name: <u>JACKSON</u>
Facility Name: <u>Bighorn 0780 S17 Tank Battery 486943</u>	Latitude: <u>40.582821</u>	Longitude: <u>-106.401265</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>17</u>	Twp: <u>7N</u>	Range: <u>80W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Agricultural cropland/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: Grizzly Creek is approximately 573 feet east of the location.

Wetlands: An area with wetland characteristics is located 495 feet east 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 Priority Habitat Management Area High Priority Habitat (HPH). Greater Sage Grouse Undesignated HPH is approximately 355 feet northwest and 557 feet east of the location.

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |   |  |
|--|---|--|
| <input 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 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 checked="" type="checkbox"/> 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 Q2 of 2022, 5 oil tanks were removed and relocated to the Veneta CTB site expansion. In Q2 of 2023, 1 oil tank replaced an out of service produced water tank on location. In Q1 of 2024, 2 oil tanks replaced 2 additional produced water tanks on location and 2 oil tanks were removed from location and disposed of. In Q2 of 2024, 1 oil tank was removed and relocated to the Veneta CTB to replace an oil tank (Attachment A). The containment liners were not compromised during the removal(s) so soil screening and sampling, at 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 operating 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**

**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.

No remediation required.

**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.

No remediation required.

**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

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). 03/01/2022

Proposed site investigation commencement. 06/06/2024

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.

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: 37147

**COA Type****Description**

	The location of the generator is not provided.  Soils shall be sampled below the footprint of the generator and sampled for Table 915-1.
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**

403902932	FORM 27-INITIAL-SUBMITTED
403902948	SITE MAP
403907201	PHOTO DOCUMENTATION

Total Attach: 3 Files

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

Environmental	Decommissioning information for Tank removal is adequate.	10/02/2024
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Total: 1 comment(s)