

State of Colorado
Energy & Carbon Management Commission

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403908659
Receive Date:
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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: <u>RENEGADE OIL & GAS COMPANY LLC</u>	Operator No: <u>74165</u>	Phone Numbers Phone: <u>(303) 680-4725</u> Mobile: <u>(303) 829-2354</u>
Address: <u>6155 S MAIN STREET #225</u>		
City: <u>AURORA</u>	State: <u>CO</u>	Zip: <u>80016</u>
Contact Person: <u>Edward Ingve</u>	Email: <u>ed@renegadeoilandgas.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37171 Initial Form 27 Document #: 403908659

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: Consistent with Rule 911.a, this Form 27 is being filed for a plug and abandonment/facility closure

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>001-07430</u>	County Name: <u>ADAMS</u>
Facility Name: <u>GFTR - STATE 6-2</u>	Latitude: <u>39.908660</u>	Longitude: <u>-104.372100</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>6</u>	Twp: <u>2S</u>	Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>319965</u>	API #: _____	County Name: <u>ADAMS</u>
Facility Name: <u>GFTR - STATE-62S62W 6NWNW</u>	Latitude: <u>39.908882</u>	Longitude: <u>-104.371995</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>6</u>	Twp: <u>2S</u>	Range: <u>62W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Dryland Farming

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

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input checked="" type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input checked="" type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input checked="" type="checkbox"/> Tank Bottoms | |
| <input checked="" 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	Visual Determination

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 GFTR State #6-2 well is in the process of being plugged and abandon. No impacts are anticipated. Grab subsurface soil samples from the wellhead area will be obtained from the excavated area around the surface casing prior to capping after screening with a PID devise and tested for Table 915 compliance. Grab subsurface soil samples from below the storage tanks and separator with be screened for impacts and sampled per Rule 911.a.(4). Onsite flow lines and dump lines will be removed after pressure testing and soil will be screened for any historical impacts. Additional soil sampling will be secured as required. The Off-Location Flowline (Location ID #474341) will be closed under a separate Form 27 given the unique circumstances associated with its removal.

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):

One or two grab soil samples adjacent (within 2 feet if possible) to the surface casing at a depth of approximately 4 feet will be acquired. Operator guidance for Rule 911.a.(4) will be utilized. At minimum one grab sample from under the oil tank, water tank and separator will be obtained and analyzed under Table 915 criteria. Soil under the facility equipment will be field screened for any historical impacts with a PID devise and additional sampling will be performed if impacts are identified.

Proposed Groundwater Sampling

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

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):

Additional investigation for any soil impacts will be performed when removal and closure of the Off-Location Flowline (location ID #474341) associated with this lease is performed. An additional Form 27 will be filed for its closure. Closure of the flowline is complex due to the abandon gas sales line within the same ditch as the flowline. It is further complicated given that both the flowline and gas sales line cross three high pressure gas transmission lines.

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.

If any contamination is found impacted soil will be hauled to an approved disposal facility after excavation.

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 impacts are anticipated. If contamination is found in soils, identified materials will be hauled offsite.

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 _____

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 general liability insurance information has been submitted with the most recent Form 1B filing.
Operator's new Financial Assurance plan has not been agreed to or approved by the ECMC.

Operator anticipates the remaining cost for this project to be: \$ 15000 _____

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.

The small excavated area around the wellhead will be back filled, re-contoured, compacted and prepared for the following year's crop. No extensive reclamation is anticipated for the well footprint.
The area around the production facility will be reclaimed after all removal of equipment and closure has been performed. Any re-contouring and ripping of the facility footprint and service road needed to accommodate the ground being placed back into agricultural use will be conducted.

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). 09/09/2024

Proposed site investigation commencement. _____

Proposed completion of site investigation. 10/11/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/07/2024

Proposed date of completion of Remediation. 11/27/2024

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

This initial Form 27 is being filed to cover the plugging and abandonment of the GFTR-State #6-2 in anticipation of final closure. The GFTR State well was drilled in 1979 and placed on production utilizing a production facility in close proximity to the well. A short flowline was constructed to that facility and will be removed after the completion of the plugging of the well and approval of this form. The facility is also requested to be closed under this Form 27 submittal. A water tank, oil tank and separator will be removed and inspected for historical contamination. A minimum of one soil grab samples will be obtained below each piece of equipment for Table 915 testing. Prior to final cut and cap of the well a minimum of one near wellbore soil grab sample will be obtained to confirm adherence to Table 915 requirements. The off-site flowline associated with this facility will be closed under a different Form 27. Several factors make this flowline removal complicated and the timeline to close that aspect of this lease differ than the plugging and closure of the GFTR-State #6-2 production facility. The other well, #2 Maynard State #6-4X, on this lease and the source of the off-site flowline is being plugged under its own Form 27 (doc #403832790).

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

Signed: Edward Ingve _____

Title: Manager/Owner _____

Submit Date: 10/02/2024 _____

Email: ed@renegadeoilandgas.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: 10/03/2024 _____

Remediation Project Number: 37171 _____

COA Type

Description

	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days). ECMC selected Quarterly under Remediation Progress Update.
	Location is adjacent to a jurisdictional Wetlands as mapped on the National Wetland Inventory Maps. In the event that operations encroach upon the wetlands, Operator shall consult with the US Army Corps of Engineers regarding compliance with Sections 401 and 404 of the Clean Water Act. Operator shall submit all communications/permits obtained to the ECMC via Form 4 Sundry. Note: Approval of this Form 27 does not supersede any Federal, State or Local regulations.
	If Groundwater is encountered, groundwater samples shall be analyzed for Table 915-1 Organic Compounds in Groundwater and Groundwater Inorganic Parameters.
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze all proposed soil samples for complete Table 915-1 Contaminants of Concern: TPH (C6-C36), Organic Compounds in Soil, metals, and 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

403908659	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403943833	AERIAL IMAGE
403943919	AERIAL IMAGE
403944671	FORM 27-INITIAL-SUBMITTED

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)