

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
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Receive Date:

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Report taken by:

Site Investigation and Remediation Workplan (Supplemental 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: OWN RESOURCES OPERATING LLC | Operator No: 10699                 | Phone Numbers         |
| Address: 305 S RIDGE STREET #6279             |                                    |                       |
| City: BRECKENRIDGE                            | State: CO                          | Zip: 80424            |
| Contact Person: Niels Phaf                    | Email: niels.phaf@ownresources.com |                       |
|   |                                    | Phone: (970) 3323585  |
|   |                                    | Mobile: (713) 6287339 |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 30288 Initial Form 27 Document #: 403420416

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 #: 125-06637 County Name: YUMA

Facility Name: ALLEN 14-19 Latitude: 39.690089 Longitude: -102.230990

\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_

QtrQtr: SWSW Sec: 19 Twp: 4S Range: 43W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION Facility ID: 303251 API #: \_\_\_\_\_ County Name: YUMA

Facility Name: ALLEN-64S43W 19SWSW Latitude: 39.690089 Longitude: -102.230990

\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_

QtrQtr: SWSW Sec: 19 Twp: 4S Range: 43W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications ML

Most Sensitive Adjacent Land Use dry land crop

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

designated groundwater management area, designated basin; Ground water depth > 220ft

## 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 |
|-----------|----------------|------------------|----------------|
| Yes       | SOILS          | Medium           | soil 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.

No initial action or emergency response measures required and / or taken, this is for a planned P&A; Scope: one location with tank, wellhead / rod pump, and separator / metershed. NO flowline / gathering line since the location was right next to the main gathering line

### 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 ):

Well was P&Ad in October 2023 - 4 samples were taken - 1 at the well head, 1 under the separator / meter shed, 1 under the tank and 1 background; These samples were taken after field screening of the well site and excavation / equipment removal screening of wellhead, tank, separator / meter shed; none of screenings identified additional shows or issues that would result in additional sampling; the samples were tested against full Table 915-1

#### Proposed Groundwater Sampling

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

No ground water observed, depth larger than 220FT

#### Proposed Surface Water Sampling

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

No surface water observed

### Additional Investigative Actions

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

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 4  
Number of soil samples exceeding 915-1 4  
Was the areal and vertical extent of soil contamination delineated? Yes  
Approximate areal extent (square feet) 220

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_  
-- Highest concentration of SAR 150  
BTEX > 915-1 No  
Vertical Extent > 915-1 (in feet) 4

### 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?

One background was taken and met all Table 915-1 requirements accept for Arsenic which has an level of 1.00 mg/kg

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?

After 18 months of sources removal we propose to take confirmation samples, which should be Q1/Q2 2025

## REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? Yes

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

All samples had high arsenic (1.17 to 1.34 mg/kg), including the background (1.00 mg/kg). Under Tank there was an SAR of 150 with a high PH of 9.0; Well head had a high PH of 10; Separator had EC of 4.5

### 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.

After P&A area has been recontoured and treated with gypsum. Historically these sources have been treated aggressively with Gypsum, which typically brings levels down to normal levels in 1 to 2 years; Arsenic will not be treated since concentrations seem to be similar to background

### Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )

\_\_\_\_\_ Chemical oxidation

\_\_\_\_\_ Air sparge / Soil vapor extraction

Yes \_\_\_\_\_ Natural Attenuation

Yes \_\_\_\_\_ Other \_\_\_\_\_ Gypsum \_\_\_\_\_

\_\_\_\_\_ 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

### 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.

Own Resources Operating is following the minimum insurance requirements of Rule 705.b and these insurances are registered with the ECMC as per Rules 705.d and 705.e. The ECMC requires a minimum of \$5M of liability coverage, which exceeds Remediation Costs. We also have an approved assurance plan Option 5

Operator anticipates the remaining cost for this project to be: \$ 1000 \_\_\_\_\_

## 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: \_\_\_\_\_

# REMEDIATION COMPLETION REPORT

## REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No \_\_\_\_\_

If YES:

Compliant with Rule 913.h.(1).

Compliant with Rule 913.h.(2).

Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

## 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 was plugged in October 2023 - all equipment was removed (pumpjack, wellhead, separator / meter shed combo, water tank). Location was recontoured and gypsum was applied. Currently location has 60% regrowth, however only 5% perennial; In Q1/Q2 2025 we will resample to ensure sources have come down sufficiently, after which we will de-compact, stitch straw and reseed with conservation approved seed. The lease road has been requested by the landowner to stay in place for his use and access to his equipment. We expect to be able to have 80% regrowth in the summer of 2026, and also have met all other reclamation rules

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? Yes

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 10/24/2023

Proposed date of completion of Reclamation. 07/01/2026

## 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. 01/20/2023

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/24/2023

Proposed site investigation commencement. 03/01/2025

Proposed completion of site investigation. 04/01/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2023

Proposed date of completion of Remediation. 03/01/2025

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:

Several milestones had not been populated; Re-sample results resulted in updated approach

**OPERATOR COMMENT**

Form 403420416 had several COAs that were addressed in the following ways:

1. No major flow lines at this small location, and connections were sampled at well head, meter shed / separator
2. Samples have been collected at the well head (no screening shows in excavation pit), Meter shed / separator connection (no screening shows under equipment), from under the tank.
3. Updated soil sampling location map attached to this Form 27s
4. Surface area will be reclaimed following 1000 series reclamation rules
5. All samples have been fully tested against table 915-1 and re-confirmation samples that will be taken in early 2025 will also be
- 6/7. Soil analytical data and summary table have been attached to this Form 27s
8. Photo documentation has been attached to this form 27s
9. No ground water was encountered during P&A activity

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

Signed: Niels Phaf

Title: CEO

Submit Date: \_\_\_\_\_

Email: niels.phaf@ownresources.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: \_\_\_\_\_

Date: \_\_\_\_\_

Remediation Project Number: 30288

**COA Type**

**Description**

|       |  |
|-------|--|
|       |  |
| 0 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**

|           |                             |
|-----------|-----------------------------|
| 403946034 | ANALYTICAL RESULTS          |
| 403946035 | ANALYTICAL RESULTS          |
| 403946041 | SOIL SAMPLE LOCATION MAP    |
| 403947367 | PHOTO DOCUMENTATION         |
| 403947373 | REMEDIATION PROGRESS REPORT |

Total Attach: 5 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)