

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403954283
Receive Date:
10/14/2024

Report taken by:
Krystal Heibel

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>OWN RESOURCES OPERATING LLC</u>	Operator No: <u>10699</u>	Phone Numbers Phone: <u>(970) 332-3585</u> Mobile: <u>()</u>
Address: <u>305 S RIDGE STREET #6279</u>		
City: <u>BRECKENRIDGE</u>	State: <u>CO</u>	Zip: <u>80424</u>
Contact Person: <u>Pat Dolezal</u>	Email: <u>pat.dolezal@ownresources.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37433 Initial Form 27 Document #: 403954283

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: <u>WELL</u>	Facility ID: _____	API #: <u>125-08346</u>	County Name: <u>YUMA</u>
Facility Name: <u>MOELLENBERG 23-31443</u>	Latitude: <u>39.665108</u>	Longitude: <u>-102.226239</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>31</u>	Twp: <u>4S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>LOCATION</u>	Facility ID: <u>304387</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>MOELLENBERG-64S43W 31NESW</u>	Latitude: <u>39.665108</u>	Longitude: <u>-102.226239</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>31</u>	Twp: <u>4S</u>	Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

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 checked="" 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 type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	unknown	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 and partial flowline abandonment. Scope: On location wellhead, pumping unit, metershed, produced water tank, abandonment of gathering line from location to disconnect location 2500' Southeast of wellhead

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):

We expect to take at least 6 samples: 1 background; 1 well head; 1 meter shed, 1 gathering line disconnect, 1 bottom of produced water tank, 1 at produced water tank inlet; We will field screen the meter shed location, well head location and full extent of the flowline; We will field screen the two excavations along each wall and floor quadrant of excavation area. We will pressure test the flow line. Based on these field, excavation screenings and pressure test results we will adjust our number and location of samples to be taken in the following way: highest soil screen location of excavation, if all zero screenings, along highest visible staining location, or if no visible staining, along wellbore, under cut and cap of off location flowline, and one back ground sample approximately 20'-30' from wellhead. All soil samples will be analyzed against Table 915-1

Proposed Groundwater Sampling

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

Groundwater is not expected in any of the excavations, water depth deeper than 150'

Proposed Surface Water Sampling

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

No permanent surface water in area

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?

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 samples don't meet table 915-1 levels remedial actions are required which typically include decompaction, natural attenuation and gypsum which will bring the most common outliers (EC, SAR) - salt content - back to allowed levels within 1-2 years

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.

Production equipment (Wellhead, meter shed and gathering line) at these P&A&R locations are used for dry natural gas and produced water (no oil or NGLs); If remediation is required it will most likely be for produced water; This historically represents itself with high salt content in soil and EC readings; Remediation action that has been efficient in the past is decompaction, natural attenuation combined with gypsum; Typical EC levels reach 915-1 table levels between 1 and 2 years;

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 ECOM 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.

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 under option 5.

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.

Upon the plugging and abandonment of well, abandoned gathering line risers and flowline risers, will be removed within 30 days; surface equipment will be removed within three (3) months of cut and cap date. Well location will then be reclaimed. Where necessary, compaction alleviation, restoration, and revegetation of well site will be performed to the standards as set up under Rule 1003.

All disturbed areas affected will be reclaimed as early and as close to their original condition or their final land use as designated by the surface owner and shall be maintained to minimize erosion. In crop lands, where necessary, added topsoil will be added to the depression and the surface will be left as close to its original contour as possible. The area shall be treated if necessary and practical to prevent invasion of undesirable species and noxious weeds, and to control erosion.

Non crop land will be contoured as close to original as possible to control erosion. The disturbed area will be reseeded in the first favorable season, if necessary. Reclamation of all disturbed areas no longer in use shall be considered complete when all surface is stabilized to minimize erosion and a uniform vegetative cover of at least eighty percent (80%).

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. 11/04/2024

Proposed date of completion of Reclamation. 10/01/2026

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. 10/10/2024

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/04/2024

Proposed site investigation commencement. 11/04/2024

Proposed completion of site investigation. 01/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/04/2024

Proposed date of completion of Remediation. 04/01/2026

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

Supplemental Form 27 will be submitted after P&A work is complete and soil analysis has been returned will include updated remediation and reclamation plans

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

Signed: Pat Dolezal

Title: Regulatory Specialist

Submit Date: 10/14/2024

Email: pat.dolezal@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: Krystal Heibel

Date: 10/22/2024

Remediation Project Number: 37433

COA Type**Description**

	Operator shall submit the next Supplemental Form 27 with all available analytical results no later than 90 days after the well cut and cap date.
	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. It appears there are several bends in the off-location flowlines that the Operator shall soil sample (full Table 915-1 analytes).
	Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.
	Operator shall provide justification for use of Residential SSL including but not limited to depth to groundwater and the local lithology. If flowline samples (at depth) indicate exceedances at depth, there is a higher likelihood of contaminants having a pathway to groundwater.
	If groundwater is encountered, Operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) and organic compounds in groundwater.
	If/when a remediation action plan is need, Operator shall provide an alternative remedial action plan. ECMC does not recognize agricultural grade gypsum application as an assertive remediation plan.
	Operator shall submit a revised "Soil Sampling Location Map" that includes: a scale, an aerial photograph that shows the location of field screenings (sidewall and bottom hole of wellhead and field screening locations along the flowlines), sample(s) of the wellhead, off-location flowlines, produced water tank, and the meter shed sampling locations, and background sample(s), per Rule 913.h.(4).A..
	Upon removing any AST, Operator will conduct a visual inspection of the soil within the former berm footprint underlying the AST. At a minimum, Operator will submit one sample per tank for laboratory analysis pursuant to Rule 915. Operator will submit a sample from an area exhibiting the highest degree of impact, or in the absence of apparent impacts from the area directly below the service hatch, where a load out valve was connected to an AST, or where subsurface piping connected to the AST at the surface. Operator will provide photographs of the bottom of the AST and the footprint after removal.
	Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
9 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.

<u>Att Doc Num</u>	<u>Name</u>
403954283	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
403954353	AERIAL IMAGE
403954356	SOIL SAMPLE LOCATION MAP
403954357	SOIL SAMPLE LOCATION MAP
403954367	PHOTO DOCUMENTATION
403965517	FORM 27-INITIAL-SUBMITTED

Total Attach: 6 Files

General Comments

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

Total: 0 comment(s)