

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403890366  
Receive Date:  
08/15/2024

Report taken by:  
Chris Sanchez

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 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>MURFIN DRILLING COMPANY INC</u>	Operator No: <u>61650</u>	<b>Phone Numbers</b>
Address: <u>250 N WATER ST STE 300</u>		Phone: <u>(316) 858-8664</u>
City: <u>WICHITA</u> State: <u>KS</u> Zip: <u>67202</u>		Mobile: <u>( )</u>
Contact Person: <u>Cristina Goodrich</u>	Email: <u>cgoodrich@murfininc.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 34352 Initial Form 27 Document #: 403687585

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>009-06371</u>	County Name: <u>BACA</u>
Facility Name: <u>S.E. CAMPO UNIT 401</u>	Latitude: <u>37.030920</u>	Longitude: <u>-102.572319</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>2</u>	Twp: <u>35S</u>	Range: <u>46W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>321072</u>	API #: _____	County Name: <u>BACA</u>
Facility Name: <u>S.E. CAMPO UNIT-635S46W 2NENW</u>	Latitude: <u>37.030920</u>	Longitude: <u>-102.572319</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>2</u>	Twp: <u>35S</u>	Range: <u>46W</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 checked="" 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	GROUNDWATER	NA	lab analysis if encountered
Yes	SOILS	1' x 1'	lab 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.

On 6/26/24, the wellhead cut & cap excavation was assessed per approved SF27 document number 403777979. Soil sample WH-FS-01@4' was collected from the floor of the cut & cap excavation and submitted to Origins Laboratory in Denver, Colorado for ECMC full Table 915-1 analysis. Laboratory results contained levels of TPH above ECMC Table 915-1 limits. Initial assessment of the flowline to be abandoned in place per approved SF27 document number 403777979 has not occurred. The United States Forest Service (USFS) has directed Murfin to put an indefinite hold on all dirt work/excavation in the Campo Field until further notice while they review previous archeological surveys. See attached site investigation report for all figures, tables, photos, closure checklists, and laboratory analytical reports for work completed to-date.

## 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 ):

After the indefinite USFS hold is lifted, excavation and removal of impacted material at the wellhead will occur. Grab confirmation soil samples will be collected from the sidewalls and floor of the excavation for laboratory analysis. Murfin would like to request ECMC approval for TPH (C6-C36) only for wellhead excavation confirmation soil samples.

### Proposed Groundwater Sampling

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

If groundwater is encountered, a grab sample will be collected and analyzed for Table 915-1 Organic Compounds in Groundwater and Groundwater Inorganic Parameters.

### 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 ):

Visual inspection of the flowline will occur during assessment activities. Field staff will use a PID to field screen a minimum of every 250' adjacent to the flowline to determine if laboratory analysis is required. Grab soil samples will be collected for lab analysis at changes in direction of the flowline as well as the end of the flowline at the separator riser. If impacts are not apparent from visual, olfactory, and PID screening, the flowline change in direction and terminus soil samples will be analyzed by a certified laboratory for full ECMC Table 915-1. If there are any apparent potential impacts, grab soil samples from those locations will be collected and analyzed for full ECMC Table 915-1. The ECMC Flowline Closure Checklist will be completed during the assessment. A photolog will be submitted on a Subsequent Form 27.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

**Soil**

Number of soil samples collected 1  
Number of soil samples exceeding 915-1 1  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 1

**NA / ND**

-- Highest concentration of TPH (mg/kg) 1474  
-- Highest concentration of SAR 11.2  
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 \_\_\_\_\_

NA Highest concentration of Benzene (µg/l) \_\_\_\_\_  
NA Highest concentration of Toluene (µg/l) \_\_\_\_\_  
NA Highest concentration of Ethylbenzene (µg/l) \_\_\_\_\_  
NA Highest concentration of Xylene (µg/l) \_\_\_\_\_  
NA 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?

On 6/26/24, background soil samples were collected from 0.5', 3', and 4' bgs from 2 separate locations away from the pad in native areas. Background soil samples were submitted to Origins for Table 915-1 Soil Suitability for Reclamation and Metals analysis.

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**

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

**SOURCE REMOVAL SUMMARY**

Describe how source is to be removed.

Well has been P&A'd.

**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.

Excavation for offsite disposal will occur.

**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  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.



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.

Reclamation will be completed in accordance with ECMC 1000 Series Rules or as agreed upon with the Surface Owner.

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? \_\_\_\_\_

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. 02/01/2024

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 02/15/2024

Proposed site investigation commencement. 06/26/2024

Proposed completion of site investigation. 11/30/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2024

Proposed date of completion of Remediation. \_\_\_\_\_

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**

Form 6 document number 403628232 is related to this form.

Form 44 document number 403634159 is related to this form.

Water well documents available on Colorado Division of Water Resources online database for water well receipt number 9072608 approximately 2,415' NE from the wellhead state a static groundwater level of 187' bgs. Per ECMC Rule 915.a., operators will adhere to the concentrations for soil cleanup in Table 915-1. Operators will use Residential Soil Screening Level Concentrations as cleanup levels.

The United States Forest Service (USFS) has directed Murfin to put an indefinite hold on all dirt work/excavation in the Campo Field until further notice while they review previous archeological surveys.

Murfin would like to request ECMC approval for TPH (C6-C36) analysis only for wellhead excavation confirmation soil samples.

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

Signed: David Castro

Title: Senior Project Scientist

Submit Date: 08/15/2024

Email: dcastro@eagle-enviro.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: Chris Sanchez

Date: 11/05/2024

Remediation Project Number: 34352

**COA Type**

**Description**

	ECMC acknowledges the Operators request for Residential SSL and does not approve at this time. Due to the close proximity to a riverine identified in the National Wetlands Inventory (USFWS) (INT), Operator shall continue to utilize Protection of Groundwater SSL.
	ECMC acknowledges the request for a reduced analyte suite and does not approve it at this time.
	Operator will continue quarterly reporting until the site investigation is complete and Full Table 915-1 standards are met within the remediation area
	Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil
4 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**

403890366	FORM 27-SUPPLEMENTAL-SUBMITTED
403890395	SITE INVESTIGATION REPORT

Total Attach: 2 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)