

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Report taken by:

Alexander Ahmadian

## 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: SMITH ENERGY CORP	Operator No: 70385	Phone Numbers
Address: 12706 SHILOH RD		Phone: (303) 894-2100
City: GREELEY	State: CO	Zip: 80631
Contact Person: James Hix - East OWP EPS	Email: james.hix@state.co.us	Mobile: (303) 905-5341

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 26745 Initial Form 27 Document #: 403281385

## 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: Form 27 supplemental - Robin Lynn #1 (OWP) well cut & cap/ Tank Battery decommissioning.

## SITE INFORMATION

Yes Multiple Facilities

Facility Type: WELL	Facility ID:	API #: 001-07365	County Name: ADAMS
Facility Name: ROBIN LYNN 1 (OWP)	Latitude: 39.798529	Longitude: -104.261993	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWSW	Sec: 7	Twp: 3S	Range: 61W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 319943	API #:	County Name: ADAMS
Facility Name: ROBIN LYNN-63S61W 7SWSW	Latitude: 39.798514	Longitude: -104.261731	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: SWSW	Sec: 7	Twp: 3S	Range: 61W Meridian: 6 Sensitive Area? Yes

## **SITE CONDITIONS**

General soil type - USCS Classifications CL

Most Sensitive Adjacent Land Use Cropland

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**

Unnamed intermittent drainage - through the location with flow directed southeast; NWI mapped wetlands = Riverine (drainage); No CPW mapped HPH; No DWR permitted water wells; however, there are two former monitoring holes within 1/4-mile that were permitted by Metro Wastewater Reclamation District (Permit #43542-MH Well Abandoned) TD = 18 ft

## 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
UNDETERMINED	GROUNDWATER	UNKNOWN	Visually, Field Screening, Analytical
UNDETERMINED	SOILS	UNKNOWN	Visually, Field Screening, Analytical

### INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

This oil and gas Location is in the Colorado ECMC Orphaned Well Program. This Form 27 is submitted for site investigation activities performed during decommissioning of Oil and Gas Facilities.

### 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 ):

Grab soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds (metals, soil suitability for reclamation).

#### Proposed Groundwater Sampling

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

If groundwater is encountered during facility decommissioning, grab groundwater samples will be collected and submitted for laboratory analysis of Table 915-1 water parameters. If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

#### Proposed Surface Water Sampling

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

Surface water samples are not expected to be collected as part of this investigation.

### Additional Investigative Actions

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

No additional alternative investigative actions are expected to be conducted as part of this site investigation.

## SITE INVESTIGATION REPORT

### SAMPLE SUMMARY

#### Soil

Number of soil samples collected 10

Number of soil samples exceeding 915-1 6

#### NA / ND

-- Highest concentration of TPH (mg/kg) 3665

-- Highest concentration of SAR 40.7

Was the areal and vertical extent of soil contamination delineated? No

BTEX > 915-1 Yes

Approximate areal extent (square feet) 5200

Vertical Extent > 915-1 (in feet) 10

#### 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?

A background soil sample, 319943\_BK01 @ 3', was collected southwest of the tank battery location and was submitted for analysis of Table 915-1 metals (As, Ba, Cd, Cu, Cr6+, Pb, Ni, Se, Ag, Zn) and soil suitability for reclamation parameters (pH, EC, SAR, and hot water soluble boron). Results showed that Arsenic, pH, EC, and SAR were above the Table 915-1 SSL or did not meet the soil suitability for reclamation levels. A background soil sample was not collected at the wellhead.

☐ 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?

Further site investigation is required at the Robin Lynn #1 (OWP) wellhead to address inorganic parameter impacts and at the Robin Lynn Tank Battery at the aboveground storage tank (AST), produced water vault (PWV), separator, and flowline where total petroleum hydrocarbons (TPH), BTEX, Arsenic, pH, EC, SAR, and boron were above Table 915-1 levels.

### 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.

If E&P Waste impacts are encountered during decommissioning of Oil and Gas Facilities, impacted soils will be excavated, temporarily stockpiled on location, and hauled to a commercial disposal facility.

#### 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.

If E&P Waste impacted soils are encountered the soils will be excavated and removed. If the horizontal and vertical extent of the E&P Waste impacts cannot be defined or removed during this initial action, then additional site investigation and remediation will be performed at a later date under a supplemental Form 27. Site data will be evaluated and remediation technologies implemented to meet Table 915-1 soil residential screening levels, protection of groundwater screening levels, or Table 915-1 groundwater and WQCC Regulation 41 numeric and narrative levels as applicable to site conditions.

#### 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  
\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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.

## REMEDATION PROGRESS UPDATE

### PERIODIC REPORTING

#### Approved Reporting Schedule:

☐ Quarterly☐ Semi-Annually☐ Annually☒ Other

Supplemental Form 27 - Oil and Gas Facilities  
Decommissioning

#### ☐ 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.

This Oil and Gas Location is in the Colorado ECMC OWP. The Operator's bond and/or other funding sources will be used to plug and abandon the well and conduct site investigation, remediation, and reclamation.

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: \_\_\_\_\_

## REMEDATION COMPLETION REPORT

### REMEDATION 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 reclamation plan will be conducted per ECMC 1000 Series Rules and prioritized based on OWP ranking, project funding, and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

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. 10/27/2023

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/18/2023

Proposed site investigation commencement. 12/06/2023

Proposed completion of site investigation. 05/02/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. \_\_\_\_\_

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**

The SMITH ENERGY CORP - 70385 ROBIN LYNN #1 (OWP) oil and gas well (API #05-001-07365) ROBIN LYNN-63S61W 7SWSW (Location ID #319943) is in the ECMC Orphaned Well Program ("OWP"). Civitas Resources/Extraction Oil & Gas Inc. plugged the Robin Lynn #1 (OWP) well as part of a public project in December 2023. The OWP oversaw decommissioning of the related Robin Lynn #1 Tank Battery and pit with soil samples collected in May 2024. This supplemental Form 27 presents the results of these oil and gas facility decommissioning activities. Groundwater was not encountered and is expected to lie at greater than 30 feet below ground surface (bgs). Analytical results for soil samples collected from the base of the wellhead excavation indicate that Table 915-1 organic compounds were not detected. Inorganic parameter analyses indicated that Arsenic, Barium, and Lead were reported in the excavation base sample, WH-B01 @7', at concentrations above Table 915-1 soil screening levels (SSL). Soil suitability for reclamation parameters pH (8.45 s.u.) and SAR (7.31) were also reported above Table 915-1 limits. Soil analytical results for samples collected in May 2024 indicated that multiple historic releases had occurred at the Robin Lynn #1 Tank Battery location. Concentrations of total petroleum hydrocarbons (TPH), BTEX, and Arsenic were reported above Table 915-1 SSL. Additionally, pH, EC, and SAR were reported above Table 915-1 limits for soil suitability for reclamation. Further site investigation and remediation are required and will proceed under Remediation Project # 26745.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 09/04/2024

Email: james.hix@state.co.us

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: 11/13/2024

Remediation Project Number: 26745

**COA Type****Description**

	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27. Per Rule 913.d.(2) Operator shall submit a Supplemental Form 27 with an updated Implementation Schedule at least 14 days in advance of any schedule changes.
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**

403909243	INVESTIGATION/REMEDIATION WORKPLAN (SUPPLEMENTAL)
403909257	ANALYTICAL RESULTS
403909259	SITE INVESTIGATION REPORT
403993164	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

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

		Stamp Upon Approval
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Total: 0 comment(s)