

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

404026023

Receive Date:

12/12/2024

Report taken by:

Chris Sanchez

## 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 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: WIEPKING-FULLERTON ENERGY LLC	Operator No: 96340	Phone Numbers Phone: (303) 5140757 Mobile: ( )
Address: PO BOX 460928		
City: DENVER	State: CO Zip: 80246	
Contact Person: Hayden Wambach	Email: haydenw@taqenergy.com	

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 38321 Initial Form 27 Document #: 404026023

## 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

No Multiple Facilities

Facility Type: LOCATION	Facility ID: 467053	API #: _____	County Name: LINCOLN
Facility Name: Gaede Tank Battery	Latitude: 39.287778	Longitude: -103.566736	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SESE	Sec: 5	Twp: 9S	Range: 55W Meridian: 6 Sensitive Area? Yes

## SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Grassland

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

## 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	SOILS	TBD	Soil Samples

**INITIAL ACTION SUMMARY**

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

Tanks and separating facilities have been drained and cleaned to prevent spills from standing equipment. All equipment is in primary containment to prevent the release of any oil and produced water.

**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 ):

First step will be the physical removal of tanks, separation equipment, flow meters and associated equipment. This is an active facility and yard with another operator. Operator will work with the current landowner and other operator to move equipment off location to continue remediation. Once equipment is off location, soil samples will be taken at each point where contamination could have occurred. That includes all tanks, separators, meter shacks and associated process equipment. Soil samples will be taken to a third party lab to test against ECMC table 915-1 standards. Continued remediation will take place if contamination is found.

**Proposed Groundwater Sampling**

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

Sampling only to take place if groundwater is encountered.

**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 ):

## SITE INVESTIGATION REPORT

**SAMPLE SUMMARY**

**Soil**

Number of soil samples collected \_\_\_\_\_ 0  
Number of soil samples exceeding 915-1 \_\_\_\_\_  
Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_  
Approximate areal extent (square feet) \_\_\_\_\_

**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 \_\_\_\_\_

**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.

**NA / ND**

\_\_\_\_\_ Highest concentration of TPH (mg/kg) \_\_\_\_\_  
\_\_\_\_\_ Highest concentration of SAR \_\_\_\_\_  
\_\_\_\_\_ BTEX > 915-1 \_\_\_\_\_  
\_\_\_\_\_ Vertical Extent > 915-1 (in feet) \_\_\_\_\_  
\_\_\_\_\_ 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) \_\_\_\_\_

**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.

Removed through excavation events if needed

**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.

If soil contamination is encountered. Soil will be removed and hauled off to an ECMC approved disposal facility with approved transfer manifests in accordance with ECMC standards.

**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  
\_\_\_\_  
Yes    Other    Soil Samples  
\_\_\_\_

\_\_\_\_ 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 Project update and sample results (if applicable)

### 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 has a \$1MM GL policy, a \$5Mm umbrella policy and a \$5MM excess liability policy. The first \$6MM coverage for sudden and accidental pollution. Company also has fully approved financial assurance on file with the ECMC for plugging and reclamation of oil and gas facilities. The cost of this project will be covered 100% by operating revenue from other oil and gas properties.

Operator anticipates the remaining cost for this project to be: \$ 25000

### 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 disturbed area at the tank battery is approximately 1.33 acres. The soil type at the tank battery is Weld Silt Loam, 0-2% slopes. The tank battery site was formerly cropland. The operator will remove gravel, cross rip, recontour as necessary, replace any top soil as needed. The operator will confer with the surface owner regarding the expected timing of the reclamation and the type of cover crop, if any, that will be needed until the surface tenant is able to farm the site. Commencement of reclamation will be determined after the Form 44 and Form 27 applications have been approved.

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. 05/05/2025

Proposed date of completion of Reclamation. 07/07/2025

## 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). \_\_\_\_\_

Proposed site investigation commencement. \_\_\_\_\_

Proposed completion of site investigation. \_\_\_\_\_

## REMEDIAL ACTION DATES

Proposed start date of Remediation. 05/05/2025

Proposed date of completion of Remediation. 07/07/2025

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:

## **OPERATOR COMMENT**

A new form 27 is being generated for this location and project. The Gaede Tank Battery was previously reported on a combined form 27 with the Gaede 8-16 location and flowline. Due to the project duration and requirements, this was separated to its own project. From 27S for the Gaede 8-16 location will be filled and reported on in its own duration.

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

Signed: Hayden Wambach

Title: VP Operations

Submit Date: 12/12/2024

Email: haydenw@taqenergy.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: 12/24/2024

Remediation Project Number: 38321

## **COA Type**

## **Description**

	If encountered operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to the Organic Compounds listed
	Operator shall collect confirmation soil samples as described in the Rule 915.e.2 Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).
	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.
	If impacted soils are encountered during facility decommissioning, the impacted soil will be segregated for proper offsite disposal and the lateral and vertical extent of impacts shall be determined with appropriate confirmation soil sampling
	Operator shall submit Quarterly Updates for this remediation project every 90 days as required by Rule 913.e. Quarterly updates shall include a current map of the subject location including current excavation limits and/or sample locations, proposed/actual soil boring locations and monitoring well locations. GPS data used to create the map must comply with ECMC Rule 216. Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit photo logs and field notes of all field activities reported during a Quarterly Update.
	ECMC does not approve the Operators proposed sampling plan,  Per Operator Guidance Document RULE 911.A.(4) - OIL AND GAS FACILITY CLOSURE, 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 AST, Separators and flowlines. These areas include, but are not limited to: where Flowlines connect to 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.  Operator shall propose an alternate sampling plan prior to commencing decommissioning activities.
7 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>
404026023	INVESTIGATION/REMEDIATION WORKPLAN (INITIAL)
404026169	OTHER
404026262	SITE MAP
404039886	FORM 27-INICIAL-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)