

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404046244
Receive Date:
01/13/2025
Report taken by:
RICK ALLISON

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: <u>MAGPIE OPERATING INC</u>	Operator No: <u>52530</u>	Phone Numbers
Address: <u>2707 SOUTH COUNTY RD 11</u>		Phone: <u>(719) 429-1434</u>
City: <u>LOVELAND</u> State: <u>CO</u> Zip: <u>80537</u>		Mobile: <u>()</u>
Contact Person: <u>Jody Kost</u>	Email: <u>magpieoil2@yahoo.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 36908 Initial Form 27 Document #: 403897678

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>069-05048</u>	County Name: <u>LARIMER</u>
Facility Name: <u>SAULCY 1</u>	Latitude: <u>40.365610</u>	Longitude: <u>-105.028469</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>29</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>307043</u>	API #: _____	County Name: <u>LARIMER</u>
Facility Name: <u>SAULCY-65N68W 29SWSE</u>	Latitude: <u>40.365589</u>	Longitude: <u>-105.028447</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>29</u>	Twp: <u>5N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: SPILL OR RELEASE Facility ID: 489042 API #: _____ County Name: LARIMER
 Facility Name: Saulcy #1 wellhead Latitude: 40.365602 Longitude: -105.028454
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: SWSE Sec: 29 Twp: 5N Range: 68W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 489043 API #: _____ County Name: LARIMER
 Facility Name: Saulcy #1 Flowline Endpoint Latitude: 40.364039 Longitude: -105.030366
 ** correct Lat/Long if needed: Latitude: _____ Longitude: _____
 QtrQtr: SWSE Sec: 29 Twp: 5N Range: 68W 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? 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

Occupied Building within ~322'.
 There are no constructed water wells within 1/4 mile.
 Dormant stream within ~135'.

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
No	GROUNDWATER	NA	Lab analysis, if encountered
Yes	SOILS	TBD	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.

Initial site assessment was conducted on 12/2/2024. Five soil samples were collected at the former wellhead (floor at 6' bgs, and wall samples @ 4' bgs) and 1 sample was collected at the separator at 4' bgs; all samples were analyzed for Full Table 915-1. Two samples were collected along the off-location flowline and screened with a PID; based on the screening levels, there was no indication that samples needed to be analyzed. Background samples were collected at 4' and 6' bgs from 3 locations. All samples submitted for analysis show that Arsenic is above Table 915-1; background samples indicate that the Local Clean-Up Level is 12.75 mg/kg (1.25 * 10.2 mg/kg). TPH exceeded at WH-FS-01 @ 6' bgs (Form 19 Doc #404045406 in process) and FL-01 @ 4' (Form 19 Doc #404045662 in process). Additionally, WH-SW-01 @ 4' shows Hexavalent Chromium exceeds at (0.32).

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):

Excavation will be conducted at the WH-FS-01, WH-SW-01 and FL-01 and confirmation samples will be collected. Magpie requests a reduced analyte suite for TPH and Hexavalent Chromium only.

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 activities, a minimum of one grab sample will be collected as soon as practical. Groundwater sample(s) will be analyzed for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chlorides) and organic compounds in water.

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

NA / ND

Number of soil samples collected 12

-- Highest concentration of TPH (mg/kg) 1656

Number of soil samples exceeding 915-1 12

-- Highest concentration of SAR 3.08

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

BTEX > 915-1 No

Approximate areal extent (square feet) 4

Vertical Extent > 915-1 (in feet) 6

Groundwater

Number of groundwater samples collected 0

NA Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

NA Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

NA Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

NA Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

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?

Background samples were collected from 3 locations at 4' and 6' bgs. Samples indicate that the Arsenic Local Clean-Up Level is 12.75 mg/kg (1.25 * 10.2 mg/kg)

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 32

Volume of liquid waste (barrels) 0

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.

Excavation will be conducted and contaminated soils will be disposed of at a certified waste disposal facility.

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.

NA

Soil Remediation Summary

In Situ

Ex Situ

 Bioremediation (or enhanced bioremediation)

 Yes Excavate and offsite disposal

 Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) 32

 Air sparge / Soil vapor extraction

Name of Licensed Disposal Facility or ECMC 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 Site Assessment Update

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.

Maggie Operating has complied with General Liability Insurance requirements per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation.

Operator anticipates the remaining cost for this project to be: \$ 2500

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards 32

E&P waste (solid) description Soils

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Pawnee Waste

Volume of E&P Waste (liquid) in barrels 0

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.

Reclamation will be completed in accordance with ECMC 1000 Series Rules or as agreed upon with the Surface Owner. (Location is in cropland)

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. 04/01/2025

Proposed date of completion of Reclamation. 08/01/2027

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. 01/02/2025

Actual Spill or Release date, or date of discovery. 12/31/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/02/2024

Proposed site investigation commencement. 12/02/2024

Proposed completion of site investigation. 03/01/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/02/2024

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:

OPERATOR COMMENT

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

Signed: Amber Barnett

Title: Compliance Specialist

Submit Date: 01/13/2025

Email: abarnett@ardorenvriental.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: RICK ALLISON

Date: 01/17/2025

Remediation Project Number: 36908

COA Type**Description**

	Operator proposes a background concentration for arsenic (10.2 mg/kg x 1.25 = 12.75 mg/kg) that is almost double all other background samples presented. However, even if eliminating the 10.2 mg/kg sample from consideration it still appears arsenic concentrations are within background.
	ECMC will not consider use of Table 915-1 Residential Soil Screening Levels until the site has been adequately characterized defining the vertical and horizontal extent of contamination. Operator has proposed to reduce analytes to TPH and Hexavalent Chromium only. Operator shall continue to analyze confirmation soil samples for ECMC Table 915-1 Soil TPH (C6-C36), Organic Compounds in Soil, and Hexavalent Chromium.
	Provide the Form 44 Document number containing the relevant flowline abandonment in place verification on the next Supplemental Form 27.
3 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**

404046244	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404046341	ANALYTICAL RESULTS
404056330	SITE INVESTIGATION REPORT
404061764	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

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

Environmental	ECMC added Spill IDs, 489042 & 489043 to this Form 27.	01/17/2025
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Total: 1 comment(s)