

State of Colorado  
Energy & Carbon Management Commission

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404034938  
Receive Date:  
12/19/2024  
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>BAYSWATER EXPLORATION &amp; PRODUCTION LLC</u>	Operator No: <u>10261</u>	<b>Phone Numbers</b>
Address: <u>730 17TH ST STE 500</u>		Phone: <u>(303) 893-2503</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>( )</u>
Contact Person: <u>Brad Rogers</u>	Email: <u>brogers@bayswater.us</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27133 Initial Form 27 Document #: 403293670

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>123-24137</u>	County Name: <u>WELD</u>
Facility Name: <u>WAAG 25-22</u>	Latitude: <u>40.552280</u>	Longitude: <u>-104.732340</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>25</u>	Twp: <u>7N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <input checked="" type="checkbox"/> Yes

Facility Type: <u>LOCATION</u>	Facility ID: <u>306185</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>WAAG-67N66W 25NWNW</u>	Latitude: <u>40.552280</u>	Longitude: <u>-104.732340</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NWNW</u>	Sec: <u>25</u>	Twp: <u>7N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <input checked="" type="checkbox"/> Yes

Facility Type: OFF-LOCATION FLOWLINE Facility ID: 461922 API #: \_\_\_\_\_ County Name: WELD  
Facility Name: WAAG T7N-R66W-S25 L01 Latitude: 40.553389 Longitude: -104.727607  
\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
QtrQtr: LOT 1 Sec: 25 Twp: 7N Range: 66W Meridian: 6 Sensitive Area? Yes

Facility Type: SPILL OR RELEASE Facility ID: 487049 API #: \_\_\_\_\_ County Name: WELD  
Facility Name: WAAG 25-22 WH Historic Release Latitude: 40.552307 Longitude: -104.732334  
\*\* correct Lat/Long if needed: Latitude: \_\_\_\_\_ Longitude: \_\_\_\_\_  
QtrQtr: NWNW Sec: 25 Twp: 7N Range: 66W Meridian: 6 Sensitive Area? Yes

**SITE CONDITIONS**

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use crop land  
Is domestic water well within 1/4 mile? Yes 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**

CR 78 450' N, CR 35 775' W, stock pond 600' NW, livestock 1,025' WSW, residence 1,120' SW

# 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	not encountered
Yes	SOILS	5'x5'x4'	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 11/25/24, excavation and removal of impacted material at WH-SS-01 @3' was completed. 4 horizontal and 1 vertical grab confirmation soil samples were collected from the approximately 6' x 6' x 4' excavation and submitted to Origins for ECMC Table 915-1 TPH (C6-C36), Organic Compounds in Soils, Arsenic, and Lead only per approved SF27 document number 403772589. All results confirm Table 915-1 compliance and removal of impacted soil is complete. See attached figures, tables, photos, and laboratory analytical report for work completed since previous SF27 document number 403976655 was submitted.

## 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 ):

### Proposed Groundwater Sampling

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

### 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 14

Highest concentration of TPH (mg/kg) \_\_\_\_\_

Number of soil samples exceeding 915-1 1

Highest concentration of SAR \_\_\_\_\_

Was the areal and vertical extent of soil contamination delineated? Yes \_\_\_\_\_

BTEX > 915-1 No

Approximate areal extent (square feet) 25

Vertical Extent > 915-1 (in feet) 3

**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?

On 4/5/24, background grab soil samples were collected from 3' and 9' bgs from 2 locations in the field away from from the wellhead excavation.

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.

Wellhead has been P&A'd and flowline removed with 2 segments abandoned-in-place.

**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 is complete.

**Soil Remediation Summary**

In Situ

Ex Situ

       Bioremediation ( or enhanced bioremediation )

       Yes Excavate and offsite disposal

       Chemical oxidation

       If Yes: Estimated Volume (Cubic Yards) 5

       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.



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 excavation was backfilled with clean material brought in, compacted, and returned to the farmer.

Is the described reclamation complete? Yes

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. 11/26/2024

Proposed date of completion of Reclamation. 11/26/2024

## 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. 05/15/2024

Actual Spill or Release date, or date of discovery. 05/14/2024

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 04/03/2024

Proposed site investigation commencement. 04/03/2023

Proposed completion of site investigation. 12/18/2024

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/30/2024

Proposed date of completion of Remediation. 12/18/2024

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**

Regarding the COA on approved SF27 document number 403976655, excavation floor grab confirmation soil sample EX-FS-01@4' results are compliant with Table 915-1 Protection of Groundwater Soil Screening Level limits, confirming impacts did not reach groundwater. Per the directive in that COA, excavation extent confirmation soil sample results are defined to Table 915-1 Residential Soil Screening Level limits or background levels where applicable.

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: 12/19/2024

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: RICK ALLISON

Date: 01/22/2025

Remediation Project Number: 27133

**COA Type****Description**

	<p>Based on the information presented, it appears that no further action is necessary at this time and the ECMC approves the closure request. However, if future conditions at the site indicate contaminant concentrations in soils exceeding ECMC standards or if groundwater is found to be impacted, then further investigation and/or remediation activities may be required.</p> <p>The surface area disturbed by the remediation activity shall be reclaimed in accordance with the 1000 Series Reclamation Rules. For locations with active ongoing oil and gas operations, comply with Rule 1003 interim reclamation requirements and for locations that will no longer have active oil and gas operations, comply with Rule 1004 Final Reclamation requirements.</p>
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**

404034938	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404034972	ANALYTICAL RESULTS
404034973	MAP
404034974	SOIL SAMPLE LOCATION MAP
404034975	SOIL SAMPLE LOCATION MAP
404034976	SOIL SAMPLE LOCATION MAP
404034977	SITE INVESTIGATION REPORT
404034978	ANALYTICAL RESULTS
404034979	ANALYTICAL RESULTS
404034982	ANALYTICAL RESULTS
404034984	PHOTO DOCUMENTATION
404066461	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 12 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

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

Total: 0 comment(s)