

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
403976824
Receive Date:
11/07/2024

Report taken by:
Kari Brown

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>(970) 6696308</u>
City: <u>LOVELAND</u>	State: <u>CO</u>	Zip: <u>80537</u>
Contact Person: <u>Jody Kost</u>	Email: <u>magpieoil2@yahoo.com</u>	Mobile: <u>()</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32769 Initial Form 27 Document #: 403566244

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>123-05153</u>	County Name: <u>WELD</u>
Facility Name: <u>SCHRADER 1</u>	Latitude: <u>40.347489</u>	Longitude: <u>-105.049524</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>LOCATION</u>	Facility ID: <u>317494</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>SCHRADER-64N68W 6NENW</u>	Latitude: <u>40.347514</u>	Longitude: <u>-105.049540</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENW</u>	Sec: <u>6</u>	Twp: <u>4N</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use Farmland

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

Residences ~500' west and ~500' southwest. Site is within HPH (Bald Eagle Active Nest Half Mile).
Nearest constructed water well is 1100 feet to the southwest of the Schrader location. The well (permit no 70296-) indicates depth to ground water ~400 feet.
Operator is requesting the use of Residential SSL's for this project, as a pathway to groundwater at this project is not likely.
Distance to nearest stream/surface water is 1445'.
Distance to nearest RBU is 340' to the north.
NRCS map data indicates soil type of Nunn clay loam, 1 to 2 percent slopes.

DENIED

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	TBD	Laboratory Analysis if encountered
Yes	SOILS	TBD	Soil samples/laboratory analytical results

INITIAL ACTION SUMMARY

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

Sampling activities took place 12/15/2023, 9/9/2024, and 10/2/2024. After 9/9/2024, further excavation was completed, and confirmation samples were collected on 10/2/2024 (Manifests are attached). Analytical results for the confirmation samples collected on 10/2/2024 show that there are no impacts remaining at the wellhead.

9/9/2024 soil sample analytical results at the FL endpoint have exceedances for TPH and Benzo(a)anthracene; (FL-SS-02, FL-SS-N01).

9/9/2024 and 10/2/2024 analytical results at 6 soil sample locations have pH exceedances; WH-SS-N02 (8.49 pH), WH-SS-E02 (8.54 pH), WH-SS-S02 (8.51 pH), WH-SS-W02 (8.47 pH), FL-SS-02 (8.39 pH), FL-SS-S01 (8.32 pH). Background samples collected on 9/9/2024 indicate the local pH levels are 8.54.

Further excavation and confirmation samples will be collected the FL endpoint. Magpie would like to request a reduced analytical suite for TPH (C6-C36) and Benzo(a)anthracene only. CPW requests that activities not to occur between Dec1-July 31 for Eagle nesting season.

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):

Further excavation and confirmation samples will be collected at the FL endpoint and and submitted for analysis of TPH (C6-C36) and Benzo (a)anthracene. CPW requests that activities not to occur between Dec1-July 31 for Eagle nesting season.

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 samples will be submitted to an accredited laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX), naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene, using standard methods appropriate for detecting the target analytes in ECMC Table 915-1.

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 26
Number of soil samples exceeding 915-1 7
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 250

NA / ND

-- Highest concentration of TPH (mg/kg) 4286
-- Highest concentration of SAR 1.75
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 6

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 _____

____ 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) _____

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 12/15/2023, 2 BG samples (BG01 @4' and BG02 @4') were collected. Additional samples were collected on 9/9/2024 at BG01 (5' and 7' bgs) and BG02 5' and 7' bgs).

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

Volume of solid waste (cubic yards) 110 Volume of liquid waste (barrels) 0

Is further site investigation required?

Further sampling is required to determine extent of contamination at FL endpoint.

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.

Facility has been decommissioned. Impacted soils will be removed and transported to Pawnee Waste.

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 and assessment is ongoing. CPW requests that activities not to occur between Dec1-July 31 for Eagle nesting season.

Soil Remediation Summary

In Situ

Ex Situ

____ Bioremediation (or enhanced bioremediation)

____ Yes Excavate and offsite disposal

Chemical oxidation
 Air sparge / Soil vapor extraction
Yes Natural Attenuation
 Other _____

If Yes: Estimated Volume (Cubic Yards) 407
Name of Licensed Disposal Facility or ECMC Facility ID # _____
No 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 90 days after work is complete

Request Alternative Reporting Schedule:

Semi-Annually Annually Other Quarterly reporting to resume after commencement of fieldwork following Bald Eagle nesting season (July 31). Next report will be filed 90 days from the next date of sampling after nesting season.

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.

Magpie 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: \$ 5000

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:

none

Volume of E&P Waste (solid) in cubic yards 407

E&P waste (solid) description contaminated soil

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.

The site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules or as per surface owner direction.

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. 07/31/2025

Proposed date of completion of Reclamation. 10/31/2025

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. 10/31/2023

Actual Spill or Release date, or date of discovery. 09/13/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/01/2023

Proposed site investigation commencement. 12/01/2023

Proposed completion of site investigation. 07/31/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/01/2023

Proposed date of completion of Remediation. 07/31/2025

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

Note: Form 19IS Document #403965635 is currently in process. The Spill/Release ID will be added to the next quarterly report.

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: 11/07/2024

Email: abarnett@ardorenvironmental.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:

Date:

Remediation Project Number: 32769

COA Type**Description**

0 COA	
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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**

403976824	FORM 27 DENIED
403985633	SITE INVESTIGATION REPORT
404076863	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

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

Environmental	ECMC has denied this Form 27 for data validation. Operator will provide laboratory analytical report(s) as a stand-alone attachment(s) on the replacement Supplemental Form 27. The Laboratory Report PDF(s) must be secured by the issuing laboratory. ECMC will not review combined PDFs with lab reports.	01/31/2025
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Total: 1 comment(s)