

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

Document Number:

403937376

Receive Date:

10/01/2024

Report taken by:

Krystal Heibel

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>OWN RESOURCES OPERATING LLC</u>	Operator No: <u>10699</u>	Phone Numbers
Address: <u>305 S RIDGE STREET #6279</u>		Phone: <u>(970) 3323585</u>
City: <u>BRECKENRIDGE</u>	State: <u>CO</u>	Zip: <u>80424</u>
Contact Person: <u>Niels Phaf</u>	Email: <u>niels.phaf@ownresources.com</u>	Mobile: <u>(713) 6287339</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 28116 Initial Form 27 Document #: 403218830

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: Gathering line abandonment in place - OWN is NOT the operator of well location / well

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>125-07031</u>	County Name: <u>YUMA</u>
Facility Name: <u>FLEER 13-2</u>	Latitude: <u>39.645727</u>	Longitude: <u>-102.269300</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>2</u>	Twp: <u>5S</u>	Range: <u>44W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

Facility Type: <u>LOCATION</u>	Facility ID: <u>303467</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>FLEER-65S44W 2SWSW</u>	Latitude: <u>39.645705</u>	Longitude: <u>-102.269247</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>2</u>	Twp: <u>5S</u>	Range: <u>44W</u>
Meridian: <u>6</u>	Sensitive Area? <u>Yes</u>		

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Pasture at well head; Crop at gas line disconnect

Is domestic water well within 1/4 mile? No

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

No high priority habitat; Designated Basin and Designated Groundwater Management Area; Seasonal intermittent stream within 400ft; Two livestock water wells one 400ft and one 1200 ft; Ground water depth >50FT

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
Yes	SOILS	Slight impact	Soil 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.

No initial action or emergency response measures required and / or taken, this is for a planned gathering line abandonment; Scope: Well Fleer 13-2 (125-07031) was P&Ad in 2016 and Own is NOT the Operator; Foundation Energy was the gatherer of that well, when Own acquired the gathering assets we noticed that the gas gathering line was not yet abandoned; In 2023 Own decided to abandon in place the unused gathering line just South to the McKee 16-2; This remediation project is only for gathering line removal, Own is not responsible for location 303467 or the well Fleer 13-2

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):

At gathering gas line abandonment in place in September 2023 3 samples were taken - 1 at the well location gas line riser, 1 at gas line disconnect just south of the McKee 16-2 and 1 background; These samples were taken after field screening of riser and disconnect excavation area and screening along the gas line; Also the gas line was pressure tested; none of screenings and pressure test identified additional shows or issues that would result in additional sampling; the samples were tested against full Table 915-1

Proposed Groundwater Sampling

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

No ground water observed, depth larger than 50FT

Proposed Surface Water Sampling

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

No surface water observed

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 3

Number of soil samples exceeding 915-1 3

NA / ND

ND Highest concentration of TPH (mg/kg)

-- Highest concentration of SAR 1

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

BTEX > 915-1 No

Approximate areal extent (square feet) 75

Vertical Extent > 915-1 (in feet) 4

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?

One background was taken and met all Table 915-1 requirements accept for Arsenic which has an level of .85 mg/kg

☐ 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? Yes

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The sample at the gas riser at the Fleer 13-2 had a slightly high PH of 8.4 versus background of 7.8; Also all locations had an elevated Arsenic level, however in the range of the background which was .85 mg/kg

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.

No further action to be taken by Own; Even though the well location has a slight PH - Own is not the operator of that location; The disconnect of the gas line slightly south of the McKee 16-2 meets all Table 915-1 requirements accept for the Arsenic level of 1.17 mg/kg, however the background sample indicated higher than Table 915-1 arsenic levels in the area at .85 mg/kg

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

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

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.

Own Resources Operating is following the minimum insurance requirements of Rule 705.b and these insurances are registered with the ECMC as per Rules 705.d and 705.e. The ECMC requires a minimum of \$5M of liability coverage, which exceeds Remediation Costs. We also have an approved assurance plan Option 5

Operator anticipates the remaining cost for this project to be: \$ 0

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:

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? No ☐

Does the previous reply indicate consideration of background concentrations?

Does Groundwater meet Table 915-1 standards? Yes ☐

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.

Gas gathering line was abandoned in place in September 2023, see Form 44 403940843. The excavations were backfilled and contoured and reseeded / returned to land owner for crops. We are not responsible for reclamation at the Fleer 13-02 location since we are not the Operator; At the gas line disconnect just south of McKee 16-02 in September 2024 we had around 50% regrowth in crop, we need to wait another growth season to get to the required 80%.

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? No

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? No

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 10/01/2023

Proposed date of completion of Reclamation. 07/01/2025

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. 01/06/2023

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/01/2023

Proposed site investigation commencement. _____

Proposed completion of site investigation. 11/01/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2023

Proposed date of completion of Remediation. 09/01/2024

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:

Several milestones had not been populated; Re-sample results resulted in updated approach

OPERATOR COMMENT

Form 27S 403683157 was denied, in it were comments that have been addressed in the following ways:

1. Soil remediation action plan has been fully populated and updated
2. Updated soil sampling map has been added to this form, including detailed scope of project has been clarified (gathering line abandonment in place only)
3. Well head facility type has been added - however Own is NOT the operator of this well (Fleer 13-2) and location (303467). OWN is the Operator of the Gathering line that was not abandoned in place by previous operator at the time of P&Aing the well in 2016
4. Site investigation report and Remedial Action plan have been fully populated and updated
5. Lab results have been added to this Form, covering full table 915-1
6. Reclamation plan has been populated following 1000 rules
7. Receptor list has been updated and detailed
8. As mentioned earlier this pad and access road are not operated by Own, we are not responsible for remediating and reclaiming the location
9. All samples taken along the gas gathering line have been fully tested against Table 915-1 and results have been attached
10. No alternative remediation plan has been provided, we believe no further remediation is required at the location where Own is responsible
11. Gathering line has been fully screened, pressure testing of the line showed no leaks and no known historical leaks; Form 44 attached; Samples have been taken at the highest risk areas and results have been shared. Guidance document states that then no further investigation is required.

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

Signed: Niels Phaf

Title: CEO

Submit Date: 10/01/2024

Email: niels.phaf@ownresources.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: Krystal Heibel

Date: 02/12/2025

Remediation Project Number: 28116

COA Type

Description

	Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.
	Closure request removed. 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 flowline. These areas include, but are not limited to: where Flowlines connect to the wellhead, 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 analyze confirmation soil samples at each flowline bend and submit the analytical results within the next submittal.
	Arsenic concentrations in confirmation soil samples exceed the Table 915-1 Residential Soil Screening Level Concentrations and are greater than 1.25 times the arsenic concentration in the background sample. Operator will provide additional data to characterize arsenic concentrations at the site and to determine its source in the next quarterly report.
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

403937376	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403940549	ANALYTICAL RESULTS
403940550	ANALYTICAL RESULTS
403940556	PHOTO DOCUMENTATION
403940557	SOIL SAMPLE LOCATION MAP
403940571	REMEDATION PROGRESS REPORT

403941206	CORRESPONDENCE
404090625	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 8 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>ECMC has removed the WELL from the "Facility Type" under Project, Purpose, and Site Information.</p> <p>"Gathering line abandonment in place - OWN is NOT the operator of well location / well"</p> <p>"No initial action or emergency response measures required and / or taken, this is for a planned gathering line abandonment; Scope: Well Fleeer 13-2 (125-07031) was P&Ad in 2016 and Own is NOT the Operator; Foundation Energy was the gatherer of that well, when Own acquired the gathering assets we noticed that the gas gathering line was not yet abandoned; In 2023 Own decided to abandon in place the unused gathering line just South to the McKee 16-2; This remediation project is only for gathering line removal, Own is not responsible for location 303467 or the well Fleeer 13-2"</p>	02/12/2025

Total: 1 comment(s)