

State of Colorado  
Energy & Carbon Management Commission

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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 ECOM 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>                 | <b>Phone Numbers</b>         |
| Address: <u>305 S RIDGE STREET #6279</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> | Phone: <u>(970) 3323585</u>  |
|                                                      |                                           | Mobile: <u>(713) 6287339</u> |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 25508 Initial Form 27 Document #: 403145304

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>125-08377</u>       | County Name: <u>YUMA</u>                                        |
| Facility Name: <u>MOELLENBERG 21-31443</u>     | Latitude: <u>39.670990</u> | Longitude: <u>-102.225685</u> |                                                                 |
| ** correct Lat/Long if needed: Latitude: _____ |                            | Longitude: _____              |                                                                 |
| QtrQtr: <u>NENW</u>                            | Sec: <u>31</u>             | Twp: <u>4S</u>                | Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

|                                                 |                            |                               |                                                                 |
|-------------------------------------------------|----------------------------|-------------------------------|-----------------------------------------------------------------|
| Facility Type: <u>LOCATION</u>                  | Facility ID: <u>304407</u> | API #: _____                  | County Name: <u>YUMA</u>                                        |
| Facility Name: <u>MOELLENBERG-64S43W 31NENW</u> | Latitude: <u>39.670990</u> | Longitude: <u>-102.225685</u> |                                                                 |
| ** correct Lat/Long if needed: Latitude: _____  |                            | Longitude: _____              |                                                                 |
| QtrQtr: <u>NENW</u>                             | Sec: <u>31</u>             | Twp: <u>4S</u>                | Range: <u>43W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

## SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Pasture @ wellhead; Crop @ gas 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**

Intermittent stream at 100ft, dry during P&A; Designated Groundwater Management area and Designated basin; Water depth over 150FT; Cattle well .2 miles away

# 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 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 |
|-----------|----------------|-------------------|----------------|
| Yes       | SOILS          | Only at well head | 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 P&A of a well and gathering line abandonment; Scope of project is P&A&R Moellenberg 21-31443 with pump jack/well head, water tank, Meter shed and a gas line abandonment in place cut an capped on the North side of County Road 7 (Form 44 403944958)

## 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 P&A in November 2022 6 samples were taken - 1 at the well head, 1 at the gas line disconnect North of County Road 7, 1 under the water tank, 1 at the in/out of water tank and 1 at the meter shed and 1 background; These samples were taken after field screening of the well head area, the tank, full flowline and meter shed; after excavation and equipment removal screening of the wellhead, meter shed disconnect, under the water tank and gas gathering line disconnect; and after flowline pressure testing; none of screenings and pressure test identified additional shows or issues that would result in additional sampling;

### 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 150 FT

### 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 6

Number of soil samples exceeding 915-1 6

### NA / ND

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

-- Highest concentration of SAR 7

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

BTEX > 915-1 No \_\_\_\_\_

Approximate areal extent (square feet) 220 \_\_\_\_\_

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?

\_\_\_\_\_

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?

We propose to take a confirmation sample in Q4 2024 the well head location - since that was the one location with SAR, PH and Boron sources; This will likely show good progress based on regrowth in the area

**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.

All samples have high arsenic 3.88 to 4.54 mg/kg, however the background sample also has 3.58 mg/kg. Arsenic seems to have higher concentrations in the area, no additional remedial actions proposed; Basically there are two locations: 1) main well location - the tank and meter shed disconnect meet all table 915-1 requirements. Only the well head has high SAR 7.04, ph 9.7 and high boron 2.58 mg/l - we have spread gypsum and typical 1-2 years reduce these levels to normal; 2) the gas line disconnect just North of road 7 meets all Table 915-1 requirements

**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.

The only area with additional remediation activity is at the well head - it has been de-compacted, strawed and treated with Gypsum after P&A. In April 2024 we again had it de-compacted, treated with gypsum and seeded. Regrowth is now around 60%, manual EC readings are .15. We will take a confirmation sample early 2025 to confirm release readiness

**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 # \_\_\_\_\_

Yes \_\_\_\_\_ Natural Attenuation

\_\_\_\_\_ Excavate and onsite remediation

Yes Other Gypsum after decompacting

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.

[Empty rectangular box for monitoring plan description]



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 well was plugged in November 2022 - all equipment was removed and basically there are two locations. The first main well location - after P&A we re-contoured, de-compacted, strawed the area and spread gypsum. In April 2024 we again had it de-compacted, treated with gypsum and seeded - see picture. Regrowth in September 2024 is now around 60%. In early 2025 we will decompact and reseed the lease road. In mid 2025 we hope we can reach the 80%. The second location is the gas line disconnect just North of road 7 this was returned to the farmer in 2023, the 2024 second growing season seems to have 100% re-growth.

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? Yes

### SITE RECLAMATION DATES

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

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. 09/20/2022

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/09/2023

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

Proposed completion of site investigation. 01/01/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/01/2022

Proposed date of completion of Remediation. 02/01/2025

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:

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

## OPERATOR COMMENT

Form 27S 403683430 was denied, the COAs have been addressed in the following ways:

1. Site investigation report and remedial action plan have been fully populated
2. Soil sampling maps have been updated and are added to this Form 27S
3. All soil samples were analyzed against Table 915-1 and results are added to the Form 27S
4. Not an alternative approach to remediation has been provided, since current approach of applying gypsum, de-compacting and strawing seems to be successful. Final confirmation sample will be taken in the coming weeks
5. See point 3
6. Full extend of flowline has been field screened, line has been pressure tested and no historical leaks are known. No potential impact areas were discovered. So we have taken samples at the highest potential impact area where the line leaves the meter shed and where it connects to the main gathering line
7. See point 6; Based on these findings according to the guidance document we do not have to sample every 250; Also this would significantly disturb growth in this environment
8. We used Residential SSL - mainly because the groundwater is deeper than 150 FT

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: 10/03/2024

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: 02/14/2025

Remediation Project Number: 25508

## COA Type

## Description

|        |                                                                                                                                                                                                                                                                                                                                                                                     |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        | Arsenic concentrations in confirmation soil sample at "Tank - bottom" 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. |
|        | Operator shall populate the analytical data summary table with complete data. The laboratory documents show that the pH at the wellhead is 9.74, while the analytical data summary table shows the pH to be 9.7.                                                                                                                                                                    |
|        | Confirmation soil samples were collected on ice and delivered to the laboratory with ice.                                                                                                                                                                                                                                                                                           |
| 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

|           |                                                  |
|-----------|--------------------------------------------------|
| 403943654 | INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL) |
| 403943984 | ANALYTICAL RESULTS                               |
| 403943985 | ANALYTICAL RESULTS                               |
| 403943986 | SOIL SAMPLE LOCATION MAP                         |
| 403943987 | PHOTO DOCUMENTATION                              |
| 403944643 | REMEDATION PROGRESS REPORT                       |
| 403944707 | CORRESPONDENCE                                   |
| 404093815 | FORM 27-SUPPLEMENTAL-SUBMITTED                   |

Total Attach: 8 Files

## General Comments

| <u>User Group</u> | <u>Comment</u>                                                                                                                                                                                                   | <u>Comment Date</u> |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Environmental     | "We propose to take a confirmation sample in Q4 2024 the well head location - since that was the one location with SAR, PH and Boron sources; This will likely show good progress based on regrowth in the area" | 02/14/2025          |

Total: 1 comment(s)