

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 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>		
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 #: 30288 Initial Form 27 Document #: 403420416

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>125-06637</u>	County Name: <u>YUMA</u>
Facility Name: <u>ALLEN 14-19</u>	Latitude: <u>39.690089</u>	Longitude: <u>-102.230990</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>19</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>303251</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>ALLEN-64S43W 19SWSW</u>	Latitude: <u>39.690089</u>	Longitude: <u>-102.230990</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>19</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 ML

Most Sensitive Adjacent Land Use dry land crop

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

designated groundwater management area, designated basin; Ground water depth > 220ft

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	Medium	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; Scope: one location with tank, wellhead / rod pump, and separator / metershed. NO flowline / gathering line since the location was right next to the main gathering line

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):

Well was P&Ad in October 2023 - 4 samples were taken - 1 at the well head, 1 under the separator / meter shed, 1 under the tank and 1 background; These samples were taken after field screening of the well site and excavation / equipment removal screening of wellhead, tank, separator / meter shed; none of screenings 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 220FT

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 4
Number of soil samples exceeding 915-1 4
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 220

NA / ND

ND Highest concentration of TPH (mg/kg) _____
-- Highest concentration of SAR 150
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 4

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?

One background was taken and met all Table 915-1 requirements except for Arsenic which has a level of 1.00 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?

After 18 months of sources removal we propose to take confirmation samples, which should be Q1/Q2 2025

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 had high arsenic (1.17 to 1.34 mg/kg), including the background (1.00 mg/kg). Under Tank there was an SAR of 150 with a high PH of 9.0; Well head had a high PH of 10; Separator had EC of 4.5

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.

After P&A area has been recontoured and treated with gypsum. Historically these sources have been treated aggressively with Gypsum, which typically brings levels down to normal levels in 1 to 2 years; Arsenic will not be treated since concentrations seem to be similar to background

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- Yes _____ Natural Attenuation
- Yes _____ Other Gypsum _____

- _____ Excavate and offsite disposal
- If Yes: Estimated Volume (Cubic Yards) _____
- Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ 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.

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 October 2023 - all equipment was removed (pumpjack, wellhead, separator / meter shed combo, water tank). Location was recontoured and gypsum was applied. Currently location has 60% regrowth, however only 5% perennial; In Q1/Q2 2025 we will resample to ensure sources have come down sufficiently, after which we will de-compact, stitch straw and reseed with conservation approved seed. The lease road has been requested by the landowner to stay in place for his use and access to his equipment. We expect to be able to have 80% regrowth in the summer of 2026, and also have met all other reclamation rules

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. 10/24/2023

Proposed date of completion of Reclamation. 07/01/2026

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. 01/20/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/24/2023

Proposed site investigation commencement. 03/01/2025

Proposed completion of site investigation. 04/01/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/01/2023

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:

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

OPERATOR COMMENT

Form 403420416 had several COAs that were addressed in the following ways:

1. No major flow lines at this small location, and connections were sampled at well head, meter shed / separator
2. Samples have been collected at the well head (no screening shows in excavation pit), Meter shed / separator connection (no screening shows under equipment), from under the tank.
3. Updated soil sampling location map attached to this Form 27s
4. Surface area will be reclaimed following 1000 series reclamation rules
5. All samples have been fully tested against table 915-1 and re-confirmation samples that will be taken in early 2025 will also be
- 6/7. Soil analytical data and summary table have been attached to this Form 27s
8. Photo documentation has been attached to this form 27s
9. No ground water was encountered during P&A activity

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: 10/05/2024

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: 30288

COA Type

Description

	Operator shall continue to remediate the impacted areas.
	Arsenic concentrations in confirmation soil sample at the separator 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.
2 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

403944863	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
403946034	ANALYTICAL RESULTS
403946035	ANALYTICAL RESULTS
403946041	SOIL SAMPLE LOCATION MAP
403947367	PHOTO DOCUMENTATION
403947373	REMEDICATION PROGRESS REPORT
404094080	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
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Total: 0 comment(s)