

State of Colorado
Energy & Carbon Management Commission

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403954690
Receive Date:
10/11/2024

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: SMITH ENERGY CORP	Operator No: 70385	Phone Numbers Phone: (303) 894-2100 Mobile: (303) 905-5341
Address: 12706 SHILOH RD		
City: GREELEY	State: CO	Zip: 80631
Contact Person: James Hix - East OWP EPS	Email: james.hix@state.co.us	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27619 Initial Form 27 Document #: 403303991

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: Wellhead cut and cap sampling

SITE INFORMATION

Yes Multiple Facilities

Facility Type: WELL	Facility ID: _____	API #: 123-20387	County Name: WELD
Facility Name: TILLIE 1-3 (OWP)	Latitude: 40.608532	Longitude: -103.626854	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 3	Twp: 7N	Range: 56W Meridian: 6 Sensitive Area? Yes
Facility Type: PIT	Facility ID: 263347	API #: _____	County Name: WELD
Facility Name: TILLIE 1-3	Latitude: 40.608487	Longitude: -103.626927	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 3	Twp: 7N	Range: 56W Meridian: 6 Sensitive Area? Yes

Facility Type: LOCATION	Facility ID: 331254	API #:	County Name: WELD
Facility Name: TILLIE-67N56W 3NWNE	Latitude: 40.608507	Longitude: -103.626967	
** correct Lat/Long if needed: Latitude:		Longitude:	
QtrQtr: NWNE	Sec: 3	Twp: 7N	Range: 56W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications ML Most Sensitive Adjacent Land Use Rangeland/dryland agriculture

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? Yes

Other Potential Receptors within 1/4 mile

No DWR Permitted Water Wells w/in 1/4-mile; nearest DWR Permitted Well ~1840 ft NE [DWR Permit #43010, Use: Domestic (1970), Perf Casing = 17.5 ft to 102 ft; Static Water Level = 17 ft, TD = 102 ft, at ~20 ft lower elevation]; a windmill and ponds are shown on the USGS Stoneham 7.5 minute quadrangle Map ~1840 ft NNE; No surface water within 1/4-mile; NWI Mapped Wetlands = Other (deflation basin or pond ~3020 ft E; Location is within CPW Mapped HPH: Pronghorn Winter Concentration Area, Residential Building Unit (RBU) across State Hwy 14 ~865 ft NE,

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
UNDETERMINED	GROUNDWATER	UNKNOWN	VISUAL, FIELD SCREENING, ANALYTICAL
UNDETERMINED	SOILS	UNKNOWN	VISUAL, FIELD SCREENING, ANALYTICAL

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 actions or emergency response measures were implemented at the location. The ECMC Orphan Well Program decommissioned the tank battery and flowlines associated with the Tillie 1-3 (OWP) well. Civitas/Extraction Oil & Gas Inc. will be plugging and abandoning the Tillie #1-3 oil and gas well as part of a public project. Cut and cap soil samples were collected in accordance with ECMC Rule 915.e(2)B. Samples will be submitted for laboratory analysis of Table 915-1 constituents.

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):

Grab soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 parameters including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds (metals, soil suitability for reclamation).

Proposed Groundwater Sampling

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

Groundwater was not encountered in the excavations during the initial investigation. A site investigation will be performed to delineate the lateral and vertical extents of E&P Waste impacts. Installation of soil borings completed groundwater monitoring wells is warranted. If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

Proposed Surface Water Sampling

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

Surface water samples are not expected to be collected as part of this initial investigation.

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

Additional Alternative investigative actions are not expected to be conducted as part of this initial Site Investigation Plan.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 1

ND Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 0 -- Highest concentration of SAR 6.28

Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No

Approximate areal extent (square feet) 14000 Vertical Extent > 915-1 (in feet) 6

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?

Site-specific background samples were not collected at the time of the wellhead cut and cap sampling. A background soil sample, Sample ID#331254_BK01 @3', was collected in an undisturbed area east of the tank battery. The background sample was submitted for analysis of Table 915-1 metals and soil suitability for reclamation. The laboratory reported a pH of 8.52 s.u. which is outside the Table 915-1 upper range of 8.3 s.u. Arsenic was reported at 2.96 mg/kg. Additional site-specific background soil samples from undisturbed areas are needed to evaluate arsenic concentrations, pH, and SAR in native soils.

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?

Further site investigation is required to delineate soil impacts that indicate historic spills/releases occurred at the produced water vault (PWV), separator (SEP02), and flowline riser at the on-location separators, and flowline connection point at the AST. Analytical results for TMBs, PAHs, pH, arsenic and barium were reported above the Table 915-1 cleanup concentrations or levels in three soil samples. The maximum vertical extent sampled was 10 feet bgs. A closure investigation of Pit #263347 will be performed in accordance with Rule 911.c. Pit Closure Guidance Document.

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.

If encountered, approximately 10 cubic yards of E&P Waste impacted soils will be excavated, temporarily stockpiled on location, and hauled offsite to a commercial disposal facility.

REMEDATION 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.

If encountered, E&P impacted soils will be excavated and hauled offsite to a commercial disposal facility. A third-party consultant will field screen soils and collect confirmation soil samples for laboratory analysis to compare results with Table 915-1 concentrations or levels. Work performed at time of Facility decommissioning indicated historic releases had occurred at the tank battery. Analytical results reported above Table 915-1 parameter concentrations or levels require additional assessment and remediation work will be performed under an approved Form 27 Site Investigation and Remediation Workplan for the pit, produced water vault, separator, and flowline connection points.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation) _____ Excavate and offsite disposal

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

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.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other A Form 27 Supplemental submitted within 90 days of receipt of results

Request Alternative Reporting Schedule:

Semi-Annually Annually Other OWP Requests Annual Reporting Schedule.

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.

The former SMITH ENERGY CORP - 70385 TILLIE #1-3 (OWP) is in the ECMC Orphaned Well Program. The Operator's bond and other funding will be used to plug and abandon the well, investigate, remediate, and reclaim the location.

Operator anticipates the remaining cost for this project to be: \$ 60000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

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? _____

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.

Reclamation will be in accordance with ECMC 1000 Series Rules. The reclamation plan will be implemented under a separate scope of work. Final reclamation will be conducted per ECMC 1000 Series Rules and prioritized based on OWP ranking, project funding, and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

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. _____

Proposed date of completion of Reclamation. _____

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. 10/27/2023

Actual Spill or Release date, or date of discovery. 08/09/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 01/27/2023

Proposed site investigation commencement. 08/09/2023

Proposed completion of site investigation. 08/28/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

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

The former SMITH ENERGY CORP - 70385 TILLIE #1-3 (OWP) oil and gas well (API #05-123-20387), TILLIE-67N56W 3NWNE (Location ID #331254), and Pit #263347 are in the ECMC Orphaned Well Program. Civitas Resources/Extraction Oil & Gas Inc. plugged and abandoned (PA) the Tillie #1-3 (OWP) well as part of a public project. This Form 27 Supplemental presents the wellhead cut and cap soil sample results. Soil samples collected from the four sidewalls and excavation base were field screened by visual, olfactory observation and photoionization detector (PID) readings which did not indicate E&P Waste impacts. The excavation base soil sample, B01 @6' (08/28/2024) was submitted for analysis of Table 915-1 soil parameters. Organic parameters were not detected at or above laboratory reporting limits. Arsenic was reported at 2.72 mg/kg which is above the Table 915-1 residential soil screening level (SSL) for arsenic. The soil pH was reported at 8.55 s.u. and SAR was reported at 6.28, which are above the Table 915-1 soil suitability for reclamation levels for these parameters. Site-specific background soil samples were not collected during the wellhead cut and cap sampling; however, a site-specific background soil sample, 331254_BK01 @3', was collected on 08/09/2023 from an undisturbed area during decommissioning of the related tank battery. The tank battery decommissioning site investigation report was submitted previously. Arsenic was reported at 2.96 mg/kg in background sample 331254_BK01 @3'. The background pH result was reported at 8.52 s.u. The NRCS mapped soil type at the Tillie #1-3 is the Platner loam, Map Unit 54, According to the Soil Survey for Weld County Colorado, Northern Part (Crabb, 1982) the calcareous subsoil (24-60 inches depth) pH ranges from 7.9 to 8.4 s.u. Further site investigation is required to delineate the lateral and vertical extent of E&P Waste impacts at the tank battery, to include a subsurface investigation to assess potential groundwater impacts, near the PWV, Separator, flowline connection points, wellhead and Pit #263347 closure samples and additional site-specific background soil samples. This work will proceed under Remediation Project #27619.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 10/11/2024

Email: james.hix@state.co.us

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: 27619

COA Type**Description**

	OWP shall provide a Soil Sample Location Map that shows the potential location of monitoring wells to be installed at this site. Per Doc# 403770794, "Due to the shallow groundwater table at this Site, Weston recommends that one or more piezometers or monitoring wells be installed at the Site to accurately gauge the water levels at the Site in the impacted areas. If groundwater is encountered, samples should be collected to determine if groundwater at the Site is impacted."
	OWP shall include analytical data for background samples within the analytical summary table, within future submissions.
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**

403954690	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
403954727	SITE INVESTIGATION REPORT
403954728	ANALYTICAL RESULTS
403954780	OTHER
404094746	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 5 Files

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

Environmental	Per Doc# 403770794, Due to shallow groundwater (~17' bgs) reported in a nearby well - OWP shall comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.	02/14/2025
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Environmental	"Further site investigation is required to delineate the lateral and vertical extent of E&P Waste impacts at the tank battery, to include a subsurface investigation to assess potential groundwater impacts, near the PWV, Separator, flowline connection points, wellhead and Pit #263347 closure samples and additional site-specific background soil samples."	02/14/2025
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Total: 2 comment(s)