

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404060938
Receive Date:
01/22/2025

Report taken by:
Kilian Collins

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: SCHNEIDER ENERGY SERVICES INC	Operator No: 76840	Phone Numbers Phone: (970) 8679437 Mobile: ()
Address: P O BOX 889		
City: FORT MORGAN	State: CO	Zip: 80701
Contact Person: Jeff Schneider	Email: jeff@schneiderenergy.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 27777 Initial Form 27 Document #: 403325050

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: WELL	Facility ID: _____	API #: 123-20447	County Name: WELD
Facility Name: YOCAM 22-32	Latitude: 40.182344	Longitude: -104.238241	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 32	Twp: 3N	Range: 61W Meridian: 6 Sensitive Area? Yes
Facility Type: LOCATION	Facility ID: 331294	API #: _____	County Name: WELD
Facility Name: YOCAM-63N61W 32SENW	Latitude: 40.182409	Longitude: -104.238493	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: SENW	Sec: 32	Twp: 3N	Range: 61W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SM

Most Sensitive Adjacent Land Use Pasture Land

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

Site is located in HPH for Pronghorn Winter Concentration; Mule Deer Winter Concentration; Mule Deer Severe Winter Range. Operator is requesting the use of Residential SSL's for this project, as a pathway to groundwater at this project is not likely.

DENIED

SITE INVESTIGATION PLAN

TYPE OF WASTE:

E&P Waste Other E&P Waste Non-E&P Waste

Produced Water Workover Fluids No waste generated

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	N/A	Laboratory Analysis if encountered
Yes	SOILS	TBD	Laboratory 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.

On 11/8/2023, 8 samples were collected at the WH, 14 samples were collected at the TB, 2 samples collected along the FL and 1 BG sample was collected. Laboratory results indicate elevated pH and SAR at WPT-SS-E @ 3' and elevated TPH at EPT-SS-C @ 3' and EPT-SS-N @ 3' & WH-SS-W @ 2'. Confirmation sampling will be conducted. Schneider would like to request for reduced analyte suite for pH, SAR, and TPH (C6-C36) only. 20 samples (15 sample locations) were determined to have elevated levels of Arsenic; additional BG samples will be collected to determine the Arsenic Local Clean-up Levels.

Form 19IS document numbers 404060255 and 404064596 have been submitted to report and document the Table 915-1 exceedances at the wellhead and tank battery, accordingly. Once approved, and Spill/Release Point ID's are assigned, these points will be added to the Form 27 Site Investigation Report Facilities List.

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):

Excavation and confirmation samples will be conducted at the former Tank Battery and wellhead. Schneider would like to request for reduced analyte suite for pH, SAR, and TPH (C6-C36) only.

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 25
Number of soil samples exceeding 915-1 20
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 0

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
0 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 11/8/23, Background @ 4' was collected. Additional BG samples will be collected to confirm BG Arsenic Local Clean-up Levels.

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?
Excavation and confirmation samples will be conducted at the former Tank Battery and wellhead. Schneider would like to request for reduced analyte suite for pH, SAR, and TPH (C6-C36) only.

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.
N/A

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.
N/A

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
_____ Natural Attenuation
_____ Other _____

_____ 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

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.

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

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?

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. 07/01/2025

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. 01/21/2025

Actual Spill or Release date, or date of discovery. 12/01/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/20/2023

Proposed site investigation commencement. 11/08/2023

Proposed completion of site investigation. 07/01/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/08/2023

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

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:

OPERATOR COMMENT

Form 19IS document numbers 404060255 and 404064596 have been submitted to report and document the Table 915-1 exceedances at the wellhead and tank battery, accordingly. Once approved, and Spill/Release Point ID's are assigned, these points will be added to the Form 27 Site Investigation Report Facilities List.

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

Signed: Mackenzie Smith

Title: Staff Engineer

Submit Date: 01/22/2025

Email: msmith@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: 27777

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
404060938	FORM 27 DENIED
404064879	ANALYTICAL RESULTS
404064883	SITE INVESTIGATION REPORT
404097085	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

General Comments

User Group	Comment	Comment Date
Environmental	Operator has not provided a Remedial Action Plan on this form submittal and states that remediation on this site commenced on 11/8/23. Operator shall resubmit and present a Remedial Action Plan as well as accurate and aggressive dates on the implementation schedule. Additionally, the Operator failed to adhere to the previously approved Quarterly reporting schedule and this site is currently out of compliance with Rules 912.a.(1), 912.a.(2), 912.b, and 913.d.(1). Operator shall provide an explanation for the failure to adhere to the approved reporting schedule and 900 series rules.	02/18/2025
Environmental	Form 19's 404064596 and 404060255 did not comply with series 900 spill reporting rules. Operator discovered these historical releases on 12/1/23 and did not notify the ECMC until 1/21/25, 417 days after discovery of the release.	02/18/2025

Total: 2 comment(s)