

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404033967
Receive Date:
12/18/2024
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>STRACHAN EXPLORATION INC</u> | Operator No: <u>83130</u> | Phone Numbers Phone: <u>(303) 790-9115</u> Mobile: <u>()</u> |
| Address: <u>992 S 4TH AVE SUITE 100-461</u> | | |
| City: <u>BRIGHTON</u> | State: <u>CO</u> | Zip: <u>80601</u> |
| Contact Person: <u>Jason Harms</u> | Email: <u>jason@strachanexploration.com</u> | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32359 Initial Form 27 Document #: 403534985

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>123-21739</u> | County Name: <u>WELD</u> |
| Facility Name: <u>FRANK 35-7</u> | Latitude: <u>40.619130</u> | Longitude: <u>-104.056450</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>SWNE</u> | Sec: <u>35</u> | Twp: <u>8N</u> | Range: <u>60W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |
| Facility Type: <u>LOCATION</u> | Facility ID: <u>332033</u> | API #: _____ | County Name: <u>WELD</u> |
| Facility Name: <u>FRANK-68N60W 35SWNE</u> | Latitude: <u>40.619130</u> | Longitude: <u>-104.056450</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>SWNE</u> | Sec: <u>35</u> | Twp: <u>8N</u> | Range: <u>60W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |

| | | | |
|--|---------------------|------------------------|---|
| Facility Type: OFF-LOCATION FLOWLINE | Facility ID: 468566 | API #: | County Name: WELD |
| Facility Name: Wellhead Line | Latitude: 40.611865 | Longitude: -104.052627 | |
| ** correct Lat/Long if needed: Latitude: | | Longitude: | |
| QtrQtr: SESE | Sec: 35 | Twp: 8N | Range: 60W Meridian: 6 Sensitive Area? No |

SITE CONDITIONS

General soil type - USCS Classifications MH _____ Most Sensitive Adjacent Land Use Rangeland _____

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

Area is within 2022 Effective Density Habitat for Pronghorn Winter Concentration

Closest Domestic Well within quarter mile – None

Additional Water Wells – Household Use 1,815' east

Nearest Surface Water - None

Nearest Occupied Building – None

Additional Occupied Buildings – None

Freshwater Emergent Wetland – 3,000' N

No other potential receptors are located within ¼ mile of the Site

Above distances are approximations

Additional Flowline Receptors:

None

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 | SOILS | No known impacts | Investigation Pending |

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

In accordance with COGCC Rule 911, this form serves as notification for the decommissioning and abandonment of the Frank 35-7 wellhead. Plugging operations were completed the week of September 26, to facilitate an offset operators frac program. The ground and sub-surfaces will be visually inspected for hydrocarbon impacts during equipment decommissioning. Field observations and photo documentation will be recorded in a field inspection form for submittal to the COGCC.

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):

Soil samples will be collected from the surface in cardinal directions of the wellhead, as defined in Rule 911.a.(4) guidance document (9/20/21), for field screening purposes. Discrete soil samples will be collected for laboratory analysis either in any area of observed hydrocarbon impacts, or adjacent to the cut and capped wellhead and below the wellhead flowline riser. Soil samples will be submitted to an accredited laboratory for analysis of TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation. See the attached Figure 1 for an illustration of the wellhead and proposed soil sample locations.

Proposed Groundwater Sampling

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

If groundwater is encountered during decommissioning and/or abandonment activities, a grab sample will be collected as soon as practical. If contaminated soil is in contact with groundwater or if free product/hydrocarbon sheen are observed, the release will be reported in accordance with Rule 912.b. Groundwater samples will be submitted for laboratory analysis of Table 915-1 Groundwater Inorganic Parameters and Organic Compounds in Groundwater.

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):

Strachan Exploration Inc will abandon in place the related wellhead flowline (approximately 2,860 feet long) with landowner agreement. The flowline will be abandoned in place with third party observations in accordance with 1105 Series Rules. During flowline closure, soil samples will be collected for field screening approximately every 250 feet along the flowline path. Soil samples collected from areas most likely to have been impacted during operation of the flowline, such as flowline risers, will be submitted for laboratory analysis of full Table 915-1 constituents. If indications of soil impacts are noted during field-screening, the sample(s) will be submitted to an accredited laboratory for the above analysis. A Form 44 will be submitted notifying of flowline removal activities within the required timeframe. See the attached Figure 1 for an illustration of the flowline alignment and proposed soil sample locations.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 0

Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 _____

Highest concentration of SAR _____

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

BTEX > 915-1 _____

Approximate areal extent (square feet) _____

Vertical Extent > 915-1 (in feet) _____

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?

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 a suspected release is identified through soil screening and/or laboratory analysis, soils may be removed and transported to a licensed disposal facility. If all source material cannot be removed during excavation activities, alternative plans will be proposed in subsequent Form 27 supplemental.

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.

If reportable soil impacts, as defined in Rule 912.b., are discovered, a site-specific remediation plan will be developed and submitted via a Supplemental Form 27. If reportable impacts are not encountered, a Supplemental Form 27 closure request will be submitted within 90 days of abandonment and/or decommissioning activities.

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
____ Other _____

____ 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 does not have site-specific financial assurance for this project; however, Operator has surface, plugging, and gas facility bonding including Surety IDs 20170089, 20170088, 20160134, 20160133 and 20150065, as well as commercial general liability and/or umbrella/excess insurance meeting the requirements of Rule 705.b.

Costs included herein are estimates only and may change over time based on numerous factors. Accordingly, Operator makes no guarantees as to the accuracy of such cost estimates, thus providing an estimate for the next year below.

Operator anticipates the remaining cost for this project to be: \$ 8000 _____

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.

Following completion of investigation or remediation activities, the location will be backfilled, compacted, and re-contoured to match pre-existing conditions. The location will be reclaimed in accordance with the COGCC 1000 series.

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. 10/18/2023

Proposed date of completion of Reclamation. 06/18/2024

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. 09/29/2023

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

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 09/29/2023

Proposed site investigation commencement. 04/01/2025

Proposed completion of site investigation. 04/14/2025

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

This Form 27 is being submitted as a quarterly update for the decommissioning of the Frank 35-7 wellhead. No investigation or sampling activities have been performed at this time due to crew availability, unforeseen delays and weather.

Please find attached Figure 1 - Proposed Soil Sample Locations for illustration of proposed sample locations, including depiction of soil samples collected every 250' along the flowline path.

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

Signed: Ryan Finley

Title: Senior Project Geologist

Submit Date: 12/18/2024

Email: rfinley@entradainc.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: 03/20/2025

Remediation Project Number: 32359

COA Type**Description**

| | |
|-------|---|
| | ECMC has processed this form as an update; no review of the attached maps was conducted. Operator shall conduct the investigation in accordance with Rule 911.a.(4) guidance and the previously approved workplan. All ongoing/unaddressed comments/COAs from previous Forms remain applicable. |
| 1 COA | |

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**

| | |
|-----------|--|
| 404033967 | INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL) |
| 404033994 | SITE INVESTIGATION PLAN |
| 404135631 | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 3 Files

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

| | | |
|---------------|---|------------|
| Environmental | "This Form 27 is being submitted as a quarterly update for the decommissioning of the Frank 35-7 wellhead. No investigation or sampling activities have been performed at this time due to crew availability, unforeseen delays and weather. Please find attached Figure 1 - Proposed Soil Sample Locations for illustration of proposed sample locations, including depiction of soil samples collected every 250' along the flowline path" | 03/20/2025 |
|---------------|---|------------|

Total: 1 comment(s)