

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404137921  
Receive Date:  
03/24/2025

Report taken by:  
Chris Sanchez

Site Investigation and Remediation Workplan (Initial 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>OGRIS OPERATING LLC</u>	Operator No: <u>10758</u>	Phone Numbers Phone: <u>(719) 2204041</u> Mobile: <u>( )</u>
Address: <u>PO BOX 53467</u>		
City: <u>MIDLAND</u>	State: <u>TX</u>	Zip: <u>79710</u>
Contact Person: <u>GIENA ZECHES</u>	Email: <u>GZECHES@OGRISOP.COM</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 39711 Initial Form 27 Document #: 404137921

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>071-08471</u>	County Name: <u>LAS ANIMAS</u>
Facility Name: <u>APACHE CANYON 14-15</u>	Latitude: <u>37.080110</u>	Longitude: <u>-104.962050</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>14</u>	Twp: <u>34S</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>PIT</u>	Facility ID: <u>292589</u>	API #: _____	County Name: <u>LAS ANIMAS</u>
Facility Name: <u>APACHE CANYON 14-15</u>	Latitude: <u>37.080210</u>	Longitude: <u>-104.962100</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>14</u>	Twp: <u>34S</u>	Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

**SITE CONDITIONS**

General soil type - USCS Classifications SC

Most Sensitive Adjacent Land Use FOREST

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 INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> E&P Waste       | <input checked="" type="checkbox"/> Other E&P Waste   | <input type="checkbox"/> Non-E&P Waste |
| <input 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 checked="" type="checkbox"/> Other (as described by EPA) NO WASTES ASSOCIATED WITH THIS PROJECT HAVE BEEN IDENTIFIED |  |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	SOILS	TBD	LABORATORY ANALYSIS OF SOIL SAMPLES

## INITIAL ACTION SUMMARY

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

THIS FORM IS BEING SUBMITTED TO COMPLY WITH ECMC RULE 911.A.(4). THE FORM SERVES AS THE INITIAL NOTIFICATION TO PLUG AND ABANDON THE APACHE CANYON 14-15 (API#05-071-08471) AND THE ASSOCIATED PIT APACHE CANYON 14-15 (FAC ID 292589).

## 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 ):

AS PART OF THE "CUT AND CAP OPERATIONS", THE APACHE CANYON 14-15 WELLHEAD WILL BE EXCAVATED. ONE SOIL SAMPLE WILL BE COLLECTED FROM AN AREA ADJACENT TO THE WELL. THE SAMPLE WILL BE SUBMITTED FOR LABORATORY ANALYSIS OF THE FULL LIST OF SOIL CONSTITUENTS IN ECMC TABLE 915-1. BACKGROUND SOIL SAMPLES MAY BE COLLECTED FROM COMPARABLE, NEARBY, NON-IMPACTED SOIL TO ESTABLISH NATIVE SOIL CONDITIONS FOR PH, EC, SAR, AND BORON PER RULE 915.E.(2).D. PHOTOS, FIELD NOTE LOGS FROM THE SAMPLE EXCAVATION/COLLECTION, AS WELL AS LABORATORY ANALYSIS WILL BE INCLUDED WITH A FORM 27A. THE BASE AND SIDEWALLS OF THE WELLHEAD EXCAVATION WILL BE VISUALLY INSPECTED AND FIELD SCREENED FOR ANY POSSIBLE EVIDENCE OF CONTAMINANTS. DURING THE FLOWLINE ABANDONMENT, ANY LIQUIDS EVACUATED FROM THE FLOWLINE WILL BE PROPERLY CONTAINED AND DISPOSED OF IN COMPLIANCE WITH RULE 905. (CONT. IN "ADDITIONAL INVESTIGATIVE ACTIONS").

### Proposed Groundwater Sampling

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

IF GROUND WATER IS ENCOUNTERED DURING SITE INVESTIGATION, A SAMPLE WILL BE COLLECTED AND SUBMITTED FOR ANALYSIS OF TABLE 915-1 CONSTITUENTS OF CONCERN.

### 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 ):

OGNIS OPERATING WILL FIELD SCREEN AREAS WHERE THE FLOWLINE CONNECTS TO THE WELLHEAD AND SURFACE EQUIPMENT, AS WELL AS THE APPROXIMATE FOOTPRINTS OF ALL PREVIOUS ASSOCIATED EQUIPMENT. ADDITIONALLY, SOIL SAMPLES WILL ALSO BE COLLECTED FROM THE BASE AND SIDEWALLS OF THE ASSOCIATED PIT AND SUBMITTED FOR LABORATORY ANALYSIS. IF FIELD SCREENING INDICATES IMPACTS TO SOIL IN ANY OF THESE LOCATIONS, THE SAMPLE EXHIBITING THE HIGHEST DEGREE OF IMPACTS BASED ON FIELD SCREENING WILL BE COLLECTED FROM THE ASSOCIATED AREA AND SUBMITTED FOR LABORATORY ANALYSIS OF THE FULL LIST OF SOIL CONSTITUENTS IN ECMC TABLE 915-1. ANY IMPACTED SOIL WILL BE SEGREGATED, STOCKPILED ON SITE, AND THE EXTENT OF IMPACTS INVESTIGATED THROUGH ADDITIONAL EXCAVATION AND CONFIRMATION SOIL SAMPLING.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected \_\_\_\_\_ 0  
Number of soil samples exceeding 915-1 \_\_\_\_\_  
Was the areal and vertical extent of soil contamination delineated? \_\_\_\_\_  
Approximate areal extent (square feet) \_\_\_\_\_

### NA / ND

\_\_\_\_\_ Highest concentration of TPH (mg/kg) \_\_\_\_\_  
\_\_\_\_\_ Highest concentration of SAR \_\_\_\_\_  
BTEX > 915-1 \_\_\_\_\_  
Vertical Extent > 915-1 (in feet) \_\_\_\_\_

### 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?

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

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

NO SOURCE REMOVAL IS WARRANTED AT THIS TIME AS NO IMPACTS ASSOCIATED WITH THE WELL HAVE BEEN IDENTIFIED. IF IMPACTS ARE IDENTIFIED AND THE EXCAVATION OF IMPACTS CANNOT BE COMPLETED AT THE TIME OF DISCOVERY, AN ASSESSMENT WILL BE MAC TO SELECT THE MOST APPROPRIATE STRATEGY FOR REMOVAL OF IMPACTS.

### 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.

A REMEDIATION PLAN WILL BE PRESENTED TO THE ECOM IF IMPACTS ARE OBSERVED DURING THE PROPOSED SITE INVESTIGATION 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  
\_\_\_\_\_ 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.

OGRIS OPERATING, LLC. MAINTAINS LIABILITY INSURANCE WITH THE STATE OF CO.

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: \_\_\_\_\_

# RECLAMATION PLAN

## RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

THE APACHE CANYON 14-15 LOCATION WILL BE RETURNED TO ORIGINAL CONTOURS DURING THE RECLAMATION PROCESS. THE APACHE CANYON 14-15 PIT WILL BE BACK FILLED TO MATCH DESIRED CONTOURS, AND ALL DISTURBED AREAS WILL BE COMPACTED, TRACKED, AND SEEDED/HYDRO MULCHED TO PROMOTE VEGETATIVE STABILIZATION. DURING THE RECLAMATION PROCESS, TEMPORARY AND PERMANENT BMPs WILL BE INSTALLED TO PROPERLY DIVERT STORMWATER AND CONTROL SEDIMENT TRAVEL. THE AREA WILL BE FURTHER MONITORED DURING GROWING SEASONS FOR ANY NECESSARY WEED TREATMENTS, ADDITIONAL NEEDED STORMWATER BMPs, AND FURTHER VEGETATIVE ESTABLISHMENT.

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. \_\_\_\_\_

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. \_\_\_\_\_

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

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/02/2025

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

Proposed completion of site investigation. \_\_\_\_\_

### 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**

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

Signed: GIENA ZECHES

Title: ENVIRONMENTAL

Submit Date: 03/24/2025

Email: GZECHES@OGRISOP.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: Chris Sanchez

Date: 03/26/2025

Remediation Project Number: 39711

**COA Type****Description**

	For Pits, Operator shall conduct a closure investigation in accordance with Rule 911.c. Pit Closure Guidance Document.
	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27.
	Operator shall provide a proposed sampling plan and sample location map identifying the locations where Confirmation Soil samples will be collected.
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days). Quarterly updates shall include a current map of the subject location including current excavation limits and/or sample locations, proposed/actual soil boring locations and monitoring well locations. GPS data used to create the map must comply with ECMC Rule 216. Operator will include historical and recent soil analytical data in a table format in Quarterly updates. Operator shall submit photo logs and field notes of all field activities reported during a Quarterly Update.
	If off location flowlines are abandon the Operator shall supply a Form 44 or Form 42 Document # for the abandonment of flowlines in accordance with Rule 1105
	Operators will collect and submit for laboratory analysis a soil sample collected from the areas most likely to have been impacted during the operational life of the AST, Separator, Surface Equipment and Flowlines. These areas include, but are not limited to: where Flowlines connect to the wellhead, surface equipment, risers, valves, or manifolds; where Flowlines bend or were repaired in the past and at joints and hammer unions; where Flowlines connect to Flowlines or equipment of different material; and where Flowlines crossed drainages or surface water or are in contact with shallow groundwater.  In addition to sampling, the Operator shall field screen the area surrounding these facilities to determine the presence or absence of potential impacts.
	Operator will submit a sample from an area of the well excavation exhibiting the highest degree of impact, or in the absence of apparent impacts, Operator will submit a sample from the base of the excavation adjacent to the Well along with photo logs of the excavation and surface areas.
	Operator shall provide a comprehensive list of all potential receptors within ¼ mile on the subsequent Supplemental Form 27. If there are none, Operator shall indicate as such in the comment box.  In addition, Operator shall conduct a review of High Priority Habitats and comply with Rule 913.b.(5).B.v. Please note that Approval of this Form 27 does not supersede any Federal, State or Local regulations. ECMC recommends consultation with Colorado Parks and Wildlife.
	Background sampling locations should be sufficiently away from the impacted area to reflect conditions not impacted by oil and gas activity, and should be obtained from similar depths and soil horizons or lithologic materials for comparison to confirmation soil samples.
	If groundwater is encountered, the Operator shall sample for Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to the Organic Compounds

	<p>Operator shall confirm the presence or absence of impacts to soils throughout the location.</p> <p>Operator shall collect confirmation soil samples as described in the Rule 915.e.2 Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).</p> <p>If impacted soils are encountered, the impacted soil will be segregated for proper offsite disposal and the lateral and vertical extent of impacts shall be determined with appropriate confirmation soil sampling</p>
11 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.

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
404137921	INVESTIGATION/REMEDATION WORKPLAN (INITIAL)
404137946	PHOTO DOCUMENTATION
404137948	MAP
404142224	FORM 27-INITIAL-SUBMITTED

Total Attach: 4 Files

**General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
		Stamp Upon Approval

Total: 0 comment(s)