

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Kari Brown

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: BLUE CHIP OIL INC	Operator No: 8840	Phone Numbers
Address: 155 E BOARDWALK DR STE 400		Phone: (970) 496-6456
City: FORT COLLINS State: CO Zip: 80525		Mobile: ()
Contact Person: Tim Hager	Email: bluechipoil@msn.com	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37067 Initial Form 27 Document #: 403903882

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

No Multiple Facilities

Facility Type: LOCATION	Facility ID: 306091	API #: _____	County Name: WELD
Facility Name: STATE-64N68W 36SESE	Latitude: 40.264440	Longitude: -104.944780	
	** correct Lat/Long if needed: Latitude: 40.265526	Longitude: -104.947730	
QtrQtr: SESE	Sec: 36	Twp: 4N	Range: 68W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Agriculture
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

204 ft from Freshwater Emergent Wetland
867 ft from Freshwater pond to south, down gradient
483 ft from Freshwater emergent Pond up gradient behind dam
753 ft from Freshwater Forested/Shrub up gradient behind dam

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- E&P Waste
- Produced Water
- Oil
- Condensate
- Drilling Fluids
- Drill Cuttings
- Other E&P Waste
- Workover Fluids
- Tank Bottoms
- Pigging Waste
- Rig Wash
- Spent Filters
- Pit Bottoms
- Other (as described by EPA)
- Non-E&P Waste
- No Waste Generated

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	NA	Lab Analysis if Encountered
UNDETERMINED	SOILS	NA	Lab 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.

A site assessment will be conducted pursuant to COGCC Rule 911 at the State 44-36 production equipment locations.

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 confirmation soil samples will be collected from the wellhead. Soil samples will be analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per COGCC Table 915-1, Metals, EC, SAR, pH, and boron.

Proposed Groundwater Sampling

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

If groundwater is encountered during the site investigation, a grab groundwater sample will be collected and analyzed for all organic compounds per COGCC 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):

Visual inspection of the location and flowlines will occur during abandonment activities. Field personnel will field screen all disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling is required. The COGCC Wellhead, Flowline, and Tank Battery Facility Closure Checklists will be utilized and filled out during the abandonment process. A photolog will be submitted on the subsequent Form 27.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 16
Number of soil samples exceeding 915-1 2
Was the areal and vertical extent of soil contamination delineated? Yes
Approximate areal extent (square feet) 100

NA / ND

ND Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 6

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) 19 Volume of liquid waste (barrels) 0
- 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.

Fiberglass partially buried vessel was removed and hauled to disposal with over-excavated margin around tank. Initial sampling before over excavating tank boundaries reflected elevated SAR on east and south walls at 37.67 and 10.54 respectively. Boundary was over-excavated by 3 ft on south and east walls and was resampled to confirm clean boundary. These are historic salt impacts, and total fluid volume from historic event is estimated less than a bbl total.

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.

All material and additional margin were excavated, removed and hauled to approved waste facility and confirmation samples are attached to this Form 27.

Soil Remediation Summary

- In Situ Ex Situ
- _____ Bioremediation (or enhanced bioremediation) Yes Excavate and offsite disposal
- _____ Chemical oxidation If Yes: Estimated Volume (Cubic Yards) 19

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

Name of Licensed Disposal Facility or ECMC Facility ID # _____
No _____ 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: \$ 5000 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____ 19

E&P waste (solid) description Dry soil, with mild SAR contamination.

ECMC Disposal Facility ID #, if applicable: _____ 0

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____ 0

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? Yes

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? Yes

Does the previous reply indicate consideration of background concentrations? Yes

Does Groundwater meet Table 915-1 standards? Yes

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 completed accordance with the requests of the land owner, any agreements and contracts related to the surface use, and in accordance with COGCC 1000 Series Rules where applicable.

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. 03/25/2025

Proposed date of completion of Reclamation. 03/25/2025

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. 06/16/2024

Actual Spill or Release date, or date of discovery. 10/15/2024

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 10/15/2024

Proposed site investigation commencement. 09/26/2024

Proposed completion of site investigation. 09/26/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 10/15/2024

Proposed date of completion of Remediation. 10/30/2024

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 to close our remediation project number 37067. On 10/15/2024 roustabouts and environmental supervision removed equipment, collected soil samples and started decommissioning the site. Samples under separators and oil tanks came back clean, and samples for the PBV on the North wall, West wall, and floor also came back within 915 limits. Samples from the PBV South wall and the East Wall were above 915 SAR concentration limits. Explanation below.

Fiberglass partially buried vessel was removed and hauled to disposal with over-excavated margin around tank. Initial sampling before over excavating tank boundaries reflected elevated SAR on east and south walls at 37.67 and 10.54 respectively. Boundary was over-excavated by 3 ft on south and east walls and was resampled to confirm clean boundary. These are historic salt impacts, and total fluid volume from historic event is estimated less than a bbl total.

Arsenic across the site is above table 915 concentration limits. When observing the concentration of arsenic in all representative samples across the site, the levels have a low standard deviation between them and when subjected to Shapiro-Wilk statistical testing it came back as a normal distribution signifying the Arsenic in the samples is naturally occurring and is not caused by oil and gas activity related to the State 44-36. The Shapiro-Wilk statistical analysis is attached to this Form 27.

Previous Denial Comment:

ECMC has denied this Form 27 for data validation. Attached analytical is not secured. Operator will provide laboratory analytical report(s) as a stand-alone attachment(s) on the replacement Supplemental Form 27. The Laboratory Report PDF(s) must be secured by the issuing laboratory; If there is a difference between the creation date and secured date of the PDF, Operator shall provide an explanation in the case narrative of the associated report. ECMC will not review combined PDFs with lab reports.

Samples were collected in October and November 2024 before ECMC began requesting Secured PDFs. EPS did not review this until after the change in desired documentation and denied previous submissions based on unsecured PDF Lab reports. This report includes secured PDFs.

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

Signed: Tim Hager

Title: President

Submit Date: 03/24/2025

Email: bluechipoil@msn.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: 37067

COA Type

Description

COA Type	Description
0 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
404132948	FORM 27 DENIED
404132957	ANALYTICAL RESULTS
404132959	ANALYTICAL RESULTS
404132962	DISPOSAL MANIFESTS
404132969	PHOTO DOCUMENTATION
404132970	OTHER
404132971	ANALYTICAL RESULTS
404132972	SOIL SAMPLE LOCATION MAP
404156493	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 9 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	<p>This form was reviewed by the following ECMC personnel prior to denial/conditional approval:</p> <p>Area Supervisor Environmental Data Group Supervisor</p>	04/08/2025
Environmental	<p>The Laboratory Analytical PDF attached to this form indicates it has been altered after lab delivery. The metadata does not indicate WHO secured the report or WHY.</p> <p>ECMC has not conducted a complete technical review of this form, data, or attachments but is denying this form.</p> <p>Operator shall request that the laboratory reissue the report. Elevations Lab has been in contact with the ECMC and knows proper securing protocols for ECMC acceptance.</p>	04/08/2025

Total: 2 comment(s)

DENIED