

State of Colorado  
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:

404087064

Receive Date:

03/14/2025

Report taken by:

John Heil

## 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 ECOM 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: CAERUS PICEANCE LLC	Operator No: 10456	Phone Numbers
Address: 1001 17TH STREET #1600		Phone: (970) 778-2314
City: DENVER	State: CO	Zip: 80202
Contact Person: Jake Janicek	Email: jjanicek@qb-energy.com	Mobile: (970) 778-2314

## PROJECT, PURPOSE &amp; SITE INFORMATION

## PROJECT INFORMATION

Remediation Project #: 36102 Initial Form 27 Document #: 403815800

## 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: PIT	Facility ID: 101728	API #: _____	County Name: RIO BLANCO
Facility Name: CORRAL CREEK 4512	Latitude: 39.940059	Longitude: -108.582235	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NWNE	Sec: 26	Twp: 1S	Range: 100W Meridian: 6 Sensitive Area? Yes

  

Facility Type: PIT	Facility ID: 117406	API #: _____	County Name: RIO BLANCO
Facility Name: 69-016755A	Latitude: 39.925656	Longitude: -108.561078	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: NENE	Sec: 36	Twp: 1S	Range: 100W Meridian: 6 Sensitive Area? Yes

Facility Type: WELL		Facility ID: _____		API #: 103-08183		County Name: RIO BLANCO	
Facility Name: CORRAL CREEK 4512				Latitude: 39.925480		Longitude: -108.560838	
** correct Lat/Long if needed: Latitude: _____ Longitude: _____							
QtrQtr: NENE	Sec: 36	Twp: 1S	Range: 100W	Meridian: 6	Sensitive Area? Yes		

Facility Type: LOCATION		Facility ID: 315262		API #: _____		County Name: RIO BLANCO	
Facility Name: CORRAL CREEK DAK-MOR FED-61S100W 36NENE				Latitude: 39.925750		Longitude: -108.560564	
** correct Lat/Long if needed: Latitude: _____ Longitude: _____							
QtrQtr: NENE	Sec: 36	Twp: 1S	Range: 100W	Meridian: 6	Sensitive Area? Yes		

### **SITE CONDITIONS**

General soil type - USCS Classifications OH \_\_\_\_\_ 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**

## **SITE INVESTIGATION PLAN**

## TYPE OF WASTE:

- ☒ E&P Waste      ☐ Other E&P Waste      ☐ Non-E&P Waste
- ☒ Produced Water      ☐ Workover Fluids
- ☐ 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
Yes	SOILS	See Maps	Field investigation and soil sampling

## INITIAL ACTION SUMMARY

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

Between August 19, 2024, and January 27, 2025, a grand total of 70 site assessment soil samples were collected adjacent to removed equipment and historic pit area.

12 soil samples were collected adjacent to the wellhead. The sample location 20241119-A36 1100-(WH-BASE)@14 will serve as the vertical point of compliance. The following soil samples will serve as the horizontal points of compliance: [20241119-A36 1100-(WH-EW02)@14], [20241119-A36 1100-(WH-NW02)@14], [20241119-A36 1100-(WH-SW02)@14], and [20241001-A36 1100-(WH-WW)@7].

19 soil samples were collected adjacent to the meter house. The sample location [20241001-A36 1100-(MH-BASE)@6] will serve as the vertical point of compliance. The following soil samples will serve as the horizontal points of compliance: [20250103-A36 1100-(MH-NW04)@15], [20250127-A36 1100-(MH-EW05)@17], [20241210-A36 1100-(T02-SW03)@8], and [20241001-A36 1100-(T02-WW)@8].

14 soil samples were collected adjacent to the buried trip tank. The sample location [20241001-A36 1100-(T02-BASE)@8] will serve as the vertical point of compliance. The following soil samples will serve as the horizontal points of compliance: [20241001-A36 1100-(T02-WW)@8], [20241210-A36 1100-(T02-SW03)@8], [20250103-A36 1100-(MH-NW04)@15], and [20250127-A36 1100-(MH-EW05)@17].

9 soil samples were collected adjacent to the separator. The sample location [20241001-A36 1100-(SEP-BASE)@7] will serve as the vertical point of compliance. The following sample locations will serve as the horizontal points of compliance: [20241001-A36 1100-(SEP-EW)@7], [20241001-A36 1100-(SEP-NW)@7], [20241001-A36 1100-(SEP-SW)@7], and [20241001-A36 1100-(SEP-WW)@7].

14 soil samples were collected adjacent to the historic pit and tank battery area. The above ground storage tank used to reside on top of the historic pit footprint. See the Operator Comment section for additional details.

## 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 ):

Additional soil samples will be collected to delineate the boron exceedances associated with the sample location [20240925-A36 1100-(FC-PL02)@5]. Please see Operator Comment section for additional details regarding soil sample [20240925-A36 1100-(FC-PL02)@5].

### Proposed Groundwater Sampling

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

### 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 70

Number of soil samples exceeding 915-1 70

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

Approximate areal extent (square feet) 2500

### NA / ND

-- Highest concentration of TPH (mg/kg) 1698.063

-- Highest concentration of SAR 14.5

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 16

### 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?

42 background samples were collected from areas north, south, east, and west of the Corral Creek Dak-Mor Fed-61S100W 36 NENE Pad. Additionally, 40 background samples collected adjacent to the nearby Corral Creek 61S99W 29 SWSW Pad (ECMC Location ID 315646) and were utilized for this investigation. Both locations are located within similar geologies and topographies and the soils at both locations contain the same parent material. Please see Figures 8 and 9 for more information on those samples.

☐ 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?

Additional soil samples will be collected to delineate the boron exceedances associated with the sample location [20240925-A36 1100-(FC-PL02)@5]. Please see Operator Comment section for additional details regarding soil sample [20240925-A36 1100-(FC-PL02)@5].

Caerus is currently reviewing remediation strategies for the remaining stockpiles on site. All stockpiles are compliant with all ECMC Table 915-1 Cleanup Levels or proposed alternative levels detailed in the Remediation Summary Section of this form, except those listed for TPH and Hexavalent Chromium. "Soil shredding" and soil disposal are the options currently being evaluated. Caerus requests that the analytical suite being used to evaluate the remaining stockpile remediation be reduced to only those analytes (TPH and Hexavalent Chromium) that existing stockpile samples exhibit exceedances of. Please see Tables 2 and 3 and Figures 2-6 for more information on these stockpile samples.

## 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.

All impacts are being considered historical. Therefore, a source cannot be identified.

## 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.

To address the arsenic exceedances, Caerus requests an alternative allowable limit of 15.75 mg/kg for arsenic per ECMC Table 915-1 Footnote 11. Analytical results of background soil samples indicated a range of background arsenic concentrations from 2.20-12.6 mg/kg (Table 2). Per ECMC Table 915-1 Footnote 11, this adjusted range would be revised to 2.75 to 15.75 mg/kg. Excluding the sample collected from the south wall [20241111-A36 1100-(T02-SW02)@8] of the combined buried drip tank and meter house excavation, arsenic concentrations exhibited in vertical and horizontal delineation sample locations fall within this range of arsenic values. The south wall of the excavation was extended horizontally, and the subsequent sample collected [20241210-A36 1100-(T02-SW03)@8] did not exceed the adjusted background range for arsenic.

pH was detected at concentrations above the ECMC Table 915-1 cleanup concentration in fifty-one (51) of the seventy (70) site assessment soil samples (Table 2). However, analytical results of background soil samples indicate a range of background pH concentrations ranging from 7.39 to 9.52 (Table 2). Caerus requests an alternative allowable range of 7.39 to 9.52 for pH per ECMC Table 915-1 Footnote 1 based on the pH concentrations demonstrated in the background soil samples (Table 2 and Appendix A). All site assessment soil samples which exhibited ECMC Table 915-1 exceedances for pH are less than or within the adjusted background range for pH or have been excavated and removed.

SAR was detected at concentrations above the ECMC Table 915-1 cleanup concentration at twenty-three (23) soil sample locations. However, analytical results of background soil samples indicate a range of background SAR concentrations ranging from 0.218 to 23.7 (Table 2). Caerus requests an alternative allowable range of 0.218 to 23.7 for SAR per ECMC Table 915-1 Footnote 1 based on the SAR concentrations demonstrated in the background soil samples. See Operator Comments

## 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

\_\_\_\_\_ Excavate and onsite remediation

\_\_\_\_\_ Other \_\_\_\_\_

\_\_\_\_\_ 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

Since remaining work is not expected until the summer of 2025, Caerus requests that the required reporting frequency be reduced to Semi-Annually.

#### 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 Q4 2024 and Q1 2025 Status Update

### 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.

Per Rule 705.b, and in line with guidance laid out in the SBAP, QB Energy has general liability insurance in the amount of \$5M, and QB Energy has umbrella insurance, which sits over the general liability insurance in the amount of \$65M. The umbrella and general liability insurance covers property damage, bodily injury to third parties, and sudden or accidental pollution under a combined \$70M.

Operator anticipates the remaining cost for this project to be: \$ 350000

### 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 completed once all site closure assessments and remediation, if necessary, activities are completed.

Is the described reclamation complete? \_\_\_\_\_

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). 08/01/2024

Proposed site investigation commencement. 08/01/2024

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

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 09/18/2024

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

Per a recent request from the ECMC, all analytical reports have been removed from the attached report of work completed and attached as separate documents to this form. The reports were included as Appendix A of the attached report.

Continued from the Initial Action Summary section:

The sample location 20241002-A36 1100-(PIT-BASE)@10 will serve as the vertical point of compliance. The following soil samples will serve as the horizontal points of compliance: [20241002-A36 1100-(PIT-EW02)@10], [20241002-A36 1100-(PIT-NW02)@10], [20241002-A36 1100-(PIT-SW02)@10], and [20241002-A36 1100-(PIT-WW02)@10].

Two (2) soil samples were collected from two locations along the off-location pipeline. Boron was detected at concentrations above the ECMC Table 915 -1 cleanup concentration in the sample collected along the pipeline right of way [20240925-A36 1100-(FC-PL02)@5]. Caerus intends to complete additional investigation and soil sampling associated with this sample location and requests a reduced analyte suite of boron only for future soil samples associated with the (FC-PL02) location.

Please see the Remediation Summary section for how Caerus plans to address the arsenic, pH, and SAR exceedances detected in site soil samples.

Continued from Remediation Summary:

All site assessment soil samples which exhibited ECMC Table 915-1 exceedances for SAR are less than or within the adjusted background range for SAR or have been excavated and removed.

Chromium (VI) was detected at concentrations above the ECMC Table 915-1 RSSLs at sixty-five (65) soil sample locations (Table 2). Soil from these locations have been excavated and subsequent soil samples are below ECMC Table 915-1 RSSLs. Due to the ECMC Table 915-1 RSSLs Cleanup Concentration for chromium (VI) being less than the Practical Quantitation Limit (PQL), the PQL of 1.00 mg/kg has been substituted for the cleanup concentration of 0.3 mg/kg as permitted in Table 915-1 Footnote 9.

TPH was detected at concentrations above the ECMC Table 915-1 RSSLs at fourteen (14) soil sample locations (Table 3). Eight (8) of the fourteen (14) samples represent site assessment samples. Soil from these site assessment sample locations have either been excavated and subsequent soil samples were collected and are below ECMC Table 915-1 cleanup concentrations. The six (6) remaining sample locations were collected from stockpiles.

No surface water or groundwater were encountered during soil sampling activities. Based on field assessment and desktop review of the area, it is believed there is no reasonable pathway for groundwater within the investigation area. The nearest registered water well (Permit # 232735) is located approximately 1 mile southeast of the Corral Creek 4512 production Wellhead and has a listed construction depth of 491 feet with no yield depth is listed. The nearest registered water well is approximately 400 feet lower in elevation than the Corral Creek 4512 production Wellhead which resides on a promontory ridge. There are multiple registered wells associated with nearby oil and gas locations with similar constructed depths with no yield depth. Therefore, Caerus requests approval to compare site sample results to ECMC Table 915-1 RSSLs.

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

Signed: Jake Janicek

Title: EHS Specialist

Submit Date: 03/14/2025

Email: jjanicek@qb-energy.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: ALEX FISCHER

Date: 04/11/2025

Remediation Project Number: 36102

## COA Type

## Description

	If Operator proposes to leave material with elevated pH in situ, Operator shall submit a reclamation plan for Director approval pursuant to Rule 915.b.
	Additional assessment of background conditions is required to establish appropriate background conditions.
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

404087064	FORM 27-SUPPLEMENTAL-SUBMITTED
404088029	ANALYTICAL RESULTS
404088032	ANALYTICAL RESULTS
404088035	ANALYTICAL RESULTS



404088040	ANALYTICAL RESULTS
404088044	ANALYTICAL RESULTS
404088045	ANALYTICAL RESULTS
404088048	ANALYTICAL RESULTS
404088049	ANALYTICAL RESULTS
404088053	ANALYTICAL RESULTS
404088055	ANALYTICAL RESULTS
404088058	ANALYTICAL RESULTS
404088059	ANALYTICAL RESULTS
404088060	ANALYTICAL RESULTS
404088061	ANALYTICAL RESULTS
404088062	ANALYTICAL RESULTS
404088065	ANALYTICAL RESULTS
404088067	ANALYTICAL RESULTS
404088068	ANALYTICAL RESULTS
404088071	ANALYTICAL RESULTS
404088074	ANALYTICAL RESULTS
404088077	ANALYTICAL RESULTS
404088081	ANALYTICAL RESULTS
404088083	ANALYTICAL RESULTS
404088087	ANALYTICAL RESULTS
404128247	SITE INVESTIGATION REPORT

Total Attach: 26 Files

### **General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Hexavalent Chromium MDL = 0.255 mg/kg	04/09/2025
Environmental	<p>SAR</p> <p>It is stated "SAR was detected at concentrations above the ECMC Table 915-1 cleanup concentration at twenty-three (23) soil sample locations. However, analytical results of background soil samples indicate a range of background SAR concentrations ranging from 0.218 to 23.7 (Table 2). Caerus requests an alternative allowable range of 0.218 to 23.7 for SAR per ECMC Table 915-1 Footnote 1 based on the SAR concentrations demonstrated in the background soil samples. See Operator Comments"</p> <p>ECMC feels that there are a sufficient amount of background samples collected at the A36 (Corral Creek 45-12), Location ID 315262</p> <p>Total average of background SAR at the A36 (Corral Creek 45-12), Location ID 315262 (Table 915-1 Footnote 1) = 4.40  Total average at 3' bgs = 0.311  Total average at 5' bgs = 16.83  Total average at 10' bgs = 6.81  Total average at 15' bgs = 3.50  Total average at 20' bgs = 2.78  Total average at 25' bgs = 2.13  Total average at 30' bgs = 2.48  Total average at 35' bgs = 2.14  Total average at 40' bgs = 2.62</p>	04/09/2025

Environmental	<p>pH</p> <p>It is stated “pH was detected at concentrations above the ECMC Table 915-1 cleanup concentration in fifty-one (51) of the seventy (70) site assessment soil samples (Table 2). However, analytical results of background soil samples indicate a range of background pH concentrations ranging from 7.39 to 9.52 (Table 2). Caerus requests an alternative allowable range of 7.39 to 9.52 for pH per ECMC Table 915-1 Footnote 1 based on the pH concentrations demonstrated in the background soil samples (Table 2 and Appendix A). All site assessment soil samples which exhibited ECMC Table 915-1 exceedances for pH are less than or within the adjusted background range for pH or have been excavated and removed. “</p> <p>ECMC feels that there is a sufficient amount of background samples collected at the A36 (Corral Creek 45-12), Location ID 315262</p> <p>Total average of background pH at the A36 (Corral Creek 45-12), Location ID 315262 (Table 915-1 Footnote 1) = 8.48  Total average at 3' bgs = 7.75  Total average at 5' bgs = 8.38  Total average at 10' bgs = 9.91  Total average at 15' bgs = 8.41  Total average at 20' bgs = 8.39  Total average at 25' bgs = 8.34  Total average at 30' bgs = 8.36  Total average at 35' bgs = 8.39  Total average at 40' bgs = 8.40</p>	04/09/2025
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Environmental	<p data-bbox="256 44 345 69">Arsenic</p> <p data-bbox="256 107 1312 426">It is stated, "To address the arsenic exceedances, Caerus requests an alternative allowable limit of 15.75 mg/kg for arsenic per ECMC Table 915-1 Footnote 11. Analytical results of background soil samples indicated a range of background arsenic concentrations from 2.20-12.6 mg/kg (Table 2). Per ECMC Table 915-1 Footnote 11, this adjusted range would be revised to 2.75 to 15.75 mg/kg. Excluding the sample collected from the south wall [20241111-A36 1100- (T02-SW02)@8] of the combined buried drip tank and meter house excavation, arsenic concentrations exhibited in vertical and horizontal delineation sample locations fall within this range of arsenic values. The south wall of the excavation was extended horizontally, and the subsequent sample collected [20241210-A36 1100-(T02-SW03)@8] did not exceed the adjusted background range for arsenic."</p> <p data-bbox="256 464 1312 548">Background arsenic concentrations at 1.84 mg/kg collected from a sample at 25' below ground surface (bgs) is from the M29 Location ID 315646 approximately 1.5 miles northeast.</p> <p data-bbox="256 585 1312 636">ECMC does not concur that the result for the sample collected from the M29 Location is appropriate for use as a representative background sample.</p> <p data-bbox="256 674 1312 758">Background arsenic concentrations at 12.6 mg/kg collected from a sample at 10' bgs (20241120-CCBG-(A36 1100-W02)@10) is from the A36 (Corral Creek 45-12), Location ID 315262.</p> <p data-bbox="256 795 1312 846">ECMC feels that there are a sufficient amount of background samples collected at the A36 (Corral Creek 45-12), Location ID 315262</p> <p data-bbox="256 884 1312 1192"> Total average of background arsenic at the A36 (Corral Creek 45-12), Location ID 315262  X 1.25 (Table 915-1 Footnote 11) = 7.12 mg/kg.  Total average X 1.25 at 3' bgs = 5.75 mg/kg  Total average X 1.25 at 5' bgs = 6.53 mg/kg  Total average X 1.25 at 10' bgs = 7.71 mg/kg  Total average X 1.25 at 15' bgs = 8.58 mg/kg  Total average X 1.25 at 20' bgs = 6.73 mg/kg  Total average X 1.25 at 25' bgs = 6.98 mg/kg  Total average 1.25 at 30' bgs = 6.15mg/kg  Total average X 1.25 at 35' bgs = 6.88 mg/kg  Total average X 1.25 at 40' bgs = 7.12 mg/kg </p>	04/09/2025
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Total: 4 comment(s)