



## 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) | Hydrocarbon contaminated soil _____    |

### DESCRIPTION OF IMPACT

| Impacted? | Impacted Media | Extent of Impact               | How Determined |
|-----------|----------------|--------------------------------|----------------|
| Yes       | SOILS          | Approx 2' x 2' x 2' (~1 cu ft) | Grab 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 has been prepared to close the Initial Form-19 (ECMC Doc#404116458) and Supplemental Form-19 (ECMC Doc# 404159739) associated with Spill Release Point 489565. This is a historic spill, it was not active and was not expected to have transport concerns. The source of the spill had already been eliminated. The spill is currently being investigated and remediated.

### 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 ):

At a minimum three (3) soil grab samples will be collected as per sampling diagram. Samples will be obtained to determine if soil at the historic spill site meets table 9-15 standards. If additional samples are required, any compounds/parameters being analyzed for will be for the compounds/parameters that exceeded Table 915 standards in the sample and not all Table 915 compounds/parameters.

#### Proposed Groundwater Sampling

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

If ground water is encountered, a ground water sample will be taken and evaluated. Ground water has not been encountered.

#### 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 3  
Number of soil samples exceeding 915-1 2  
Was the areal and vertical extent of soil contamination delineated? No  
Approximate areal extent (square feet) 4

### NA / ND

-- Highest concentration of TPH (mg/kg) 15900  
-- Highest concentration of SAR 6.9  
BTEX > 915-1 Yes  
Vertical Extent > 915-1 (in feet) 1

### 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) 5.2  
-- Highest concentration of Toluene (µg/l) 15  
-- Highest concentration of Ethylbenzene (µg/l) 8.7  
-- Highest concentration of Xylene (µg/l) 57  
NA 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?

Additional sampling and removal of impacted soil

## REMEDIAL ACTION PLAN

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soil will be excavated and stored onsite in a lined containment. Impacted soil is will be transported to Kit Carson landfill when all impacted soil has been removed or enough soil has accumulated to economically haul to the landfill.

### 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.

This site is the Rhoades Unit Gas Plant yard and thus will be continued to be used as such. The work was started in March and is anticipated to be completed by July 2025.  
Based on sample analysis, impacted soil will be excavated and removed. Impacted soil will be stored on site in lined containment until it can be hauled to an approved waste disposal facility (Kit Carson Landfill). Clean soil will be hauled in and leveled.

### Soil Remediation Summary

In Situ

Ex Situ

\_\_\_\_\_ Bioremediation ( or enhanced bioremediation )      Yes      Excavate and offsite disposal

\_\_\_\_\_ Chemical oxidation  
\_\_\_\_\_ Air sparge / Soil vapor extraction  
\_\_\_\_\_ Natural Attenuation  
\_\_\_\_\_ Other \_\_\_\_\_

If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_ 1  
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: \_\_\_\_\_

# 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.

This site is the existing Rhoades Unit Gas Plant Yard. It is a graveled yard enclosed by a 6' tall chain link fence. The yard will continue to be used for this purpose after the remediation of this historic spill.

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. 01/27/2025

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/08/2025

Proposed site investigation commencement. 03/08/2025

Proposed completion of site investigation. 06/30/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 03/20/2025

Proposed date of completion of Remediation. 06/30/2025

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**

This initial Form-27 is being used to close the spill release point 489565 as the 90-day timing to use a Form-19 has elapsed.

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

Signed: Ty Smith

Title: Consultant

Submit Date: 04/10/2025

Email: tysmith@lesair.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: 05/07/2025

Remediation Project Number: 40325

**COA Type****Description**

|  |   |
|--|---|
|  | <p>Upon approval of this Form 27-i, Operator shall submit a supplemental Form 19-s request closure for Spill Facility ID 489565</p> <p>The Supplemental Report for this spill/release was not submitted within 10 days of discovery of the spill/release as required by Rule 912.b.(4). Operator will provide explanation for late report on the next Form 19 Supplemental including actions implemented to prevent late reporting in the future.</p>   |
|  | The Operator shall add Spill Facility ID 489565 as a related facility under Facility Type in the next Supplemental Form filing  |
|  | <p>Operator shall submit Quarterly Updates for this remediation project every 90 days as required by Rule 913.e. 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 field notes of all field activities reported during a Quarterly Update.</p> <p>ECMC selected Quarterly under Remediation Progress Update.</p> |
|  | If groundwater is encountered, the Operator shall sample for Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to the Organic Compounds  |
|  | 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.  |
|  | <p>Operator shall define the vertical and lateral extent of impacts to soil. Additional sampling is required to fully delineate the vertical and lateral impacts to soil</p> <p>Operator shall collect confirmation soil samples for Full Table 915-1 Contaminants of Concern</p>   |
|  | Operator shall adhere to Protection of Groundwater Soil Screening Levels  |
|  | <p>Attached analytical results do not reflect Full Table 915-1 Contaminates of Concern. Operator shall provide analytical data for PAHs along with attached data.</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>   |
|  | ECMC acknowledges the attached analytical table. However, the Operator shall provide the associated Lab Report in the next supplemental Form filing.  |

9 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.

| <u>Att Doc Num</u> | <u>Name</u>                                 |
|--------------------|---|
| 404159746          | INVESTIGATION/REMEDATION WORKPLAN (INITIAL) |
| 404160071          | AERIAL IMAGE                                |
| 404160072          | AERIAL IMAGE                                |
| 404160073          | SOIL SAMPLE LOCATION MAP                    |
| 404160074          | ANALYTICAL DATA SUMMARY TABLE(S)            |
| 404160075          | PHOTO DOCUMENTATION                         |
| 404193123          | FORM 27-INITIAL-SUBMITTED                   |

Total Attach: 7 Files

### General Comments

| <u>User Group</u> | <u>Comment</u>   | <u>Comment Date</u> |
|-------------------|--|---------------------|
| Environmental     | ECMC was not able to located Supplemental Form-19 (ECMC Doc# 404159739), | 05/07/2025          |

Total: 1 comment(s)