

State of Colorado
Energy & Carbon Management Commission

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404209753

Receive Date:
05/21/2025

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>PADCO LLC</u>	Operator No: <u>24500</u>	Phone Numbers
Address: <u>16508 ARMINTA STREET</u>		Phone: <u>(918) 630-9912</u>
City: <u>VAN NUYS</u> State: <u>CA</u> Zip: <u>91406</u>		Mobile: <u>()</u>
Contact Person: <u>DAN RICHMOND</u>	Email: <u>DAN@DSRINC.NET</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 7798 Initial Form 27 Document #: 200381240

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: Skim Pit Closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>121-10379</u>	County Name: <u>WASHINGTON</u>
Facility Name: <u>GARY GEBAUER 2</u>	Latitude: <u>40.043190</u>	Longitude: <u>-103.267830</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>23</u>	Twps: <u>1N</u>	Range: <u>53W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use PASTURE

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

Unknown

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	Localized in pit	Cont. by berms, no leakage apparent

INITIAL ACTION SUMMARY

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

The once operative skim pit subject to Remediation Project# 7798 was decommissioned in or around June 2013 by PADCO LLC. At the time of decommissioning, PADCO introduced appropriate fill material into the excavated pit and compacted the soils with the footprint of former skim pit located on lands immediately adjacent to an existing evaporation pit found on the location. PADCO has entered into a purchase and sale agreement with another operator, namely Impetro Resources LLC, which includes the Gary Gebauer 2, API No. 05-121-10379, and associated production facilities under Facility ID# 237876. Impetro Resources LLC will take full responsibility for Remediation Project# 7798 on transfer of the facility under an approved Form 9, Transfer of Operator.

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):

PADCO has been advised that once operations are closed at this oil and gas facility, the operator will be required to close the existing evaporation pit and perform sampling of soils via boreholes of adequate depth to satisfy ECMC Rules and Table 915-1 concentration levels.

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):

Impetro Resources is applying for operatorship of this lease and will assume responsibilities under an approved Investigation Plan.

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

PADCO has been advised that once operations are closed at this oil and gas facility, the operator will be required to close the existing evaporation pit and perform sampling of soils via boreholes of adequate depth to satisfy ECMC Rules and Table 915-1 concentration levels.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 2
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? No
Approximate areal extent (square feet) 0

NA / ND

Highest concentration of TPH (mg/kg) _____
Highest concentration of SAR _____
BTEX > 915-1 No
Vertical Extent > 915-1 (in feet) 2

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
0 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) 1 Volume of liquid waste (barrels) 1

Is further site investigation required?

The once operative skim pit subject to Remediation Project# 7798 was decommissioned in or around June 2013 by PADCO LLC, unfortunately, records of disposal of E&P waste along with sample locations and testing of samples (which conformed to then Rule 910 concentrations levels) were not timely recorded with ECMC or are nonexistent. At the time of decommissioning, PADCO introduced appropriate fill material into the excavated pit and compacted the soils with the footprint of former skim pit located on lands immediately adjacent to an existing evaporation pit found on the location. Once operations are closed at this oil and gas facility, the operator will be required to close the existing evaporation pit and perform sampling of soils via boreholes of adequate depth to satisfy ECMC Rules and Table 915-1 concentration levels. PADCO has entered into a purchase and sale agreement with another operator, namely Impetro Resources LLC, which includes the Gary Gebauer 2, API No. 05-121-10379, and associated production facilities under Facility ID# 237876. Impetro Resources LLC will take full responsibility for Remediation Project# 7798 on transfer of the facility under an approved Form 9, Transfer of Operator.

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.

Skim pit was emptied by vac truck; fluids take to licensed disposal site. Contaminated earthen liner has been excavated to apparent clean soil and stored on a plastic liner with containment to prevent run-off; samples of pit bottom to be taken to confirm we are down to clean soil.

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.

The once operative skim pit subject to Remediation Project# 7798 was decommissioned in or around June 2013 by PADCO LLC, unfortunately, records of disposal of E&P waste along with sample locations and testing of samples (which conformed to then Rule 910 concentrations levels) were not timely recorded with ECMC or are nonexistent. At the time of decommissioning, PADCO introduced appropriate fill material into the excavated pit and compacted the soils with the footprint of former skim pit located on lands immediately adjacent to an existing evaporation pit found on the location. Once operations are closed at this oil and gas facility, the operator will be required to close the existing evaporation pit and perform sampling of soils via boreholes of adequate depth to satisfy ECMC Rules and Table 915-1 concentration levels. PADCO has entered into a purchase and sale agreement with another operator, namely Impetro Resources LLC, which includes the Gary Gebauer 2, API No. 05-121-10379, and associated production facilities under Facility ID# 237876. Impetro Resources LLC will take full responsibility for Remediation Project# 7798 on transfer of the facility under an approved Form 9, Transfer of Operator.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

If Yes: Estimated Volume (Cubic Yards) _____ 0

_____ 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

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.

PADCO has maintained \$5,000,000 general liability insurance as required by the ECMC. On approval of the Form 9, Transfer of Operatorship - Subsequent, it is likely PADCO will terminate general liability insurance as all assets will be transferred to Impetro Resources, LLC.

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

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.

The once operative skim pit subject to Remediation Project# 7798 was decommissioned in or around June 2013 by PADCO LLC, unfortunately, records of disposal of E&P waste along with sample locations and testing of samples (which conformed to then Rule 910 concentrations levels) were not timely recorded with ECMC. At the time of decommissioning, PADCO introduced appropriate fill material into the excavated pit and compacted the soils with the footprint of former skim pit located on lands immediately adjacent to an existing evaporation pit found on the location. Once operations are closed at this oil and gas facility, the operator will be required to close the existing evaporation pit and perform sampling of soils via boreholes of adequate depth to satisfy ECMC Rules and Table 915-1 concentration levels. PADCO has entered into a purchase and sale agreement with another operator, namely Impetro Resources LLC, which includes the Gary Gebauer 2, API No. 05-121-10379, and associated production facilities under Facility ID# 237876. Impetro Resources LLC will take full responsibility for Remediation Project# 7798 on transfer of the facility under an approved Form 9, Transfer of Operator.

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. 12/31/2026

Proposed date of completion of Reclamation. 07/01/2027

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). 02/05/2013

Proposed site investigation commencement. 02/05/2013

Proposed completion of site investigation. 12/31/2013

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/31/2026

Proposed date of completion of Remediation. 12/31/2027

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:

The once operative skim pit subject to Remediation Project# 7798 was decommissioned in or around June 2013 by PADCO LLC, unfortunately, records of disposal of E&P waste along with sample locations and testing of samples (which conformed to then Rule 910 concentrations levels) were not timely recorded with ECMC or are nonexistent. At the time of decommissioning, PADCO introduced appropriate fill material into the excavated pit and compacted the soils with the footprint of former skim pit located on lands immediately adjacent to an existing evaporation pit found on the location. Once operations are closed at this oil and gas facility, the operator will be required to close the existing evaporation pit and perform sampling of soils via boreholes of adequate depth to satisfy ECMC Rules and Table 915-1 concentration levels. PADCO has entered into a purchase and sale agreement with another operator, namely Impetro Resources LLC, which includes the Gary Gebauer 2, API No. 05-121-10379.

OPERATOR COMMENT

The once operative skim pit subject to Remediation Project# 7798 was decommissioned in or around June 2013 by PADCO LLC, unfortunately, records of disposal of E&P waste along with sample locations and testing of samples (which conformed to then Rule 910 concentrations levels) were not timely recorded with ECMC or are nonexistent. At the time of decommissioning, PADCO introduced appropriate fill material into the excavated pit and compacted the soils with the footprint of former skim pit located on lands immediately adjacent to an existing evaporation pit found on the location. PADCO has entered into a purchase and sale agreement with another operator, namely Impetro Resources LLC, which includes the Gary Gebauer 2, API No. 05-121-10379, and associated production facilities under Facility ID# 237876. Impetro Resources LLC will take full responsibility for Remediation Project# 7798 on transfer of the facility under an approved Form 9, Transfer of Operator. Refer to Form 9, Transfer of Operatorship - Subsequent, under ECMC Document ID# 403904610.

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

Signed: Dan Richmond

Title: Consultant for PADCO

Submit Date: 05/21/2025

Email: DAN@DSRINC.NET

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: 05/28/2025

Remediation Project Number: 7798

COA Type

Description

	The buying operator (Impetro Resources) shall submit a remediation workplan to conduct the necessary environmental investigation for this pit closure remediation project.
	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.
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

404209753	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404212444	CORRESPONDENCE
404212445	PHOTO DOCUMENTATION
404212446	CORRESPONDENCE
404212447	AERIAL IMAGE
404212451	ANALYTICAL RESULTS
404212452	OTHER
404212455	ANALYTICAL RESULTS
404212456	OTHER
404212457	OTHER
404219214	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 11 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	"PADCO has entered into a purchase and sale agreement with another operator, namely Impetro Resources LLC, which includes the Gary Gebauer 2, API No. 05-121-10379, and associated production facilities under Facility ID# 237876. Impetro Resources LLC will take full responsibility for Remediation Project# 7798 on transfer of the facility under an approved Form 9, Transfer of Operator. Refer to Form 9, Transfer of Operatorship - Subsequent, under ECMC Document ID# 403904610."	05/28/2025

Total: 1 comment(s)