

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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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 Phone: <u>(918) 630-9912</u> Mobile: <u>()</u>
Address: <u>16508 ARMINTA STREET</u>		
City: <u>VAN NUYS</u> State: <u>CA</u> Zip: <u>91406</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

Yes Multiple Facilities

Facility Type: <u>PIT</u>	Facility ID: <u>101039</u>	API #: _____	County Name: <u>WASHINGTON</u>
Facility Name: <u>GARY GEBAUER 2</u>	Latitude: <u>40.045263</u>	Longitude: <u>-103.265185</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>14</u>	Twp: <u>1N</u>	Range: <u>53W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
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>	Twp: <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:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" 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 type="checkbox"/> 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 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.

The former Skim Pit only had elevated SAR concentrations, as identified in historical analytical reposts (see attached). The former skim pit was located along the east wall of the currently active evaporation pit; additional site investigation at this time would effect the integrity of the active pit berm/wall. Operator requests any further site investigation be delayed until the location is fully decommissioned or the current pit is no longer needed for operations. At time of facility decommissioning, a site investigation plan will be submitted to address residual SAR contamination from the former skim pit including full assessment of the location per the Rules.

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 time of facility decommissioning, the operator will be required to close the existing evaporation pit and perform sampling of soils to satisfy ECMC Rules and Table 915-1.

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

NA / ND

Number of soil samples collected 7

Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 6 -- Highest concentration of SAR 26.4
 Was the areal and vertical extent of soil contamination delineated? No BTEX > 915-1 No
 Approximate areal extent (square feet) 0 Vertical Extent > 915-1 (in feet) 2

Groundwater

Number of groundwater samples collected 0 Highest concentration of Benzene (µg/l) _____
 Was extent of groundwater contaminated delineated? No Highest concentration of Toluene (µg/l) _____
 Depth to groundwater (below ground surface, in feet) _____ Highest concentration of Ethylbenzene (µg/l) _____
 Number of groundwater monitoring wells installed _____ Highest concentration of Xylene (µg/l) _____
 Number of groundwater samples exceeding 915-1 _____ 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?
 At time of facility decommissioning, the operator will be required to close the existing evaporation pit and perform sampling of soils to satisfy ECMC Rules and Table 915-1.

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

If Yes: Estimated Volume (Cubic Yards) _____ 0
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.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Supplemental 27 will be submitted when pit and/or facility is decommissioned.

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: _____

REMEDATION COMPLETION REPORT

REMEDATION 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 site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules per surface owner direction.

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. 01/01/2040

Proposed date of completion of Reclamation. 01/01/2041

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. 01/01/2040

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

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

Signed: Amber Barnett

Title: Compliance Specialist

Submit Date: 06/03/2025

Email: abarnett@ardorenvironmental.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: Krystal Heibel

Date: 06/16/2025

Remediation Project Number: 7798

COA Type**Description**

	Operator shall update the SITE CONDITIONS section of the form. Facility is 0.09 miles away from a tributary of Surveyor Creek.
	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the subsequent Supplemental Form 27. Operator shall provide the "Date of Surface Owner notification/consultation" information.
	Per Rule 913.g., within 60 days of the Director's approval of a Form 9 – Subsequent pursuant to Rule 218.e, the Buying Operator will submit a supplemental Form 27 designating the responsible Operator for all open Remediation projects.
	"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." Operator shall provide a remediation plan for the skim pit within the next submission.
	Per Rule 915.f. If Remediation at a site subject to an open Form 19 or Form 27 is not completed by January 15, 2022, then the Operator will comply with the current version of Table 915-1.
	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)).
	Further site investigation is needed. Operator shall conduct a closure investigation in accordance with Rule 911.c. Pit Closure Guidance Document.
	In accordance with Rule 913.e.(3), Operator will adopt a quarterly reporting schedule (every 90 days). ECMC selected Quarterly under Remediation Progress Update since pit decommissioning activities have begun. "At time of facility decommissioning, the operator will be required to close the existing evaporation pit and perform sampling of soils to satisfy ECMC Rules and Table 915-1." "Operator requests any further site investigation be delayed until the location is fully decommissioned or the current pit is no longer needed for operations."
	As stated in Doc# 404209753, "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."

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>
404224397	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404226672	ANALYTICAL RESULTS
404226721	SITE MAP
404242788	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	ECMC added Pit Facility ID: 101039, facility: GARY GEBAUER 2 to the Site Information tab.	06/16/2025

Total: 1 comment(s)