

State of Colorado
Energy & Carbon Management Commission

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Document Number:
404248969
Receive Date:
06/20/2025

Report taken by:
John Heil

Site Investigation and Remediation Workplan (Initial 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>TEP ROCKY MOUNTAIN LLC</u>	Operator No: <u>96850</u>	Phone Numbers
Address: <u>1058 COUNTY ROAD 215</u>		
City: <u>PARACHUTE</u>	State: <u>CO</u>	Zip: <u>81635</u>
Contact Person: <u>Michael Gardner</u>	Email: <u>mgarder@terraep.com</u>	Phone: <u>(970) 263-2760</u>
		Mobile: <u>(970) 623-4875</u>

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41287 Initial Form 27 Document #: 404248969

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: <u>PIT</u>	Facility ID: <u>489327</u>	API #: _____	County Name: <u>RIO BLANCO</u>
Facility Name: <u>RGU 23-7-297 Drill Cuttings Trench</u>	Latitude: <u>39.888469</u>	Longitude: <u>-108.328876</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>LOT 15</u>	Sec: <u>7</u>	Twp: <u>2S</u>	Range: <u>97W</u>
Meridian: <u>6</u>	Sensitive Area? <u>No</u>		

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

Nearest permitted water well (permit # 68235-F) is located 5,148 feet to the northeast and does not indicate any groundwater static water levels. It is assumed that groundwater is >100 feet as outlined within the Sensitive Area Determination (SAD).

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
No	SOILS	None	Confirmation 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.

The purpose of this Form 27 is to request permanent closure of the cuttings trench located at the RGU 23-7 well pad. This request is for the routine, planned closure of the cuttings trench. There is no historical or current spill associated with this Form 27.

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):

Soil samples will be collected in accordance with the Form 15 (Doc# 402867227) and associated Waste Management Plan (Doc# 402473770). Cuttings samples will be collected from wells as drilling occurs as well as the post mixed drill cuttings trench.

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 15

Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 0

Highest concentration of SAR _____

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

BTEX > 915-1 _____

Approximate areal extent (square feet) 15030

Vertical Extent > 915-1 (in feet) 19

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) 100

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed 0

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 0

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?

Samples from be nearby undisturbed soils adjacent to the RGU 23-7 will be collected, as well as samples previously collected from nearby locations will utilized to establish a background baseline for inorganic and arsenic concentrations.

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?

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

N/A - Cuttings will remain onsite within the trench.

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.

Cuttings will be mixed at a 1:1 ration with clean material and sampled for ECMC Table 915-1 as outlined within the approved Form 15 (Doc# 402867227) and associated Waste Management Plan (Doc# 402473770). Any cuttings that exceed that capacity of the trench will be hauled to the Starkey Gulch CWMF Cuttings Trench and managed in accordance with the approved Form 28 (Facility ID 476647 / Doc# 2573157).

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
Yes Other Within cuttings trench

____ 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.

None

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.

Please see TEP's current Financial Assurance Plan (see attached Form 3 Doc #403378610) that was previously approved by ECMC, and which was effective on April 26, 2023. This Financial Assurance Plan has been provided to comply with the Financial Assurance requirements outlined in the ECMC Section 700 rules and provides adequate information to fully address anticipated costs pertaining to the plugging, abandonment, and remediation of any TEP well / facility. Per ECMC's approval of this Financial Assurance Plan (Form 3), TEP's existing financial assurance levels are deemed sufficient to protect against property damage, bodily injury to personnel and contractors, or any potential releases of pollution to the environment that may threaten public health, safety, or welfare.

Operator anticipates the remaining cost for this project to be: \$ 0 _____

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.

Interim reclamation of the pad will be performed per the attached construction and reclamation plans. In general, clean, stockpiled fill material is added to the drill cuttings and mixed within the cuttings trench using large excavators and dozers to thoroughly mix and blend the material. The mixed material is sampled on multiple occasions throughout the mixing process to ensure that Table 915-1 cleanup standards are achieved. Once the treated / mixed cuttings materials have successfully attained Table 915-1 cleanup standards, the mixed materials are contoured within the trench. The trench is then covered (capped) with a uniform layer of clean fill material. The cap and cut-slope areas are then contoured to match the pre-existing and adjacent slopes and topography as closely as possible. Stockpiled topsoil is then spread over the recontoured areas.

The interim reclamation areas are then hydro-seeded with a seed mix approved by the surface owner (BLM). This seed mix is attached. Soil amendments will also be used as needed to optimize successful germination. Storm water BMPs are installed per TEP Best Management Practice (BMP) manual to protect the newly reclaimed site and to minimize and control sediment from leaving the location. The progress and success of revegetation efforts at this location will be closely monitored by TEP staff. This location is part of TEP's annual weed spraying and control program which is designed to prevent the establishment and spread of noxious weeds.

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. _____

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). 04/24/2024

Proposed site investigation commencement. 04/24/2024

Proposed completion of site investigation. 07/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/24/2024

Proposed date of completion of Remediation. 05/21/2024

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

Please forward onto John Heil

This Initial Form 27 is being submitted to request a REM# for the management of drill cuttings located on the RGU 23-7 well pad.

As outlined within the Form 15 (Doc# 402867227/ Pit # 489327) submitted on 11/10/2021 and approved on 02/20/2025, as well as the Waste Management Plan (Doc# 402473770), cuttings will be managed onsite within a trench. Any volume that cannot be managed onsite within the trench will be hauled to the Starkey Gulch CWMF Cuttings Trench and managed in accordance with the approved Form 28 (Facility ID 476647 / Doc# 2573157).

Initial baseline samples from the cuttings will be collected at the commencement of mixing, as well as again upon completion of mixing for confirmation. Compliance with ECMC Table 915-1 will be confirmed prior to any final placement and backfilling (capping) within the trench. Samples will be collected throughout the profile of the trench and consist of various depths from surface to 19-feet below ground surface.

An estimated 15 samples will be collected from within the cuttings trench designed to hold 7,000 yards of cuttings.

Background samples will be collected around the well pad, as well as background samples from the adjacent locations will be used to establish a background level for arsenic and inorganic.

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

Signed: Kris Rowe

Title: TEP Environmental

Submit Date: 06/20/2025

Email: Krowe@terraep.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: John Heil

Date: 07/07/2025

Remediation Project Number: 41287

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
404248969	FORM 27-INITIAL-SUBMITTED
404249075	OTHER
404249077	REMEDIAL ACTION PLAN
404249078	OTHER
404249079	MAP
404249080	OTHER
404249095	SOIL SAMPLE LOCATION MAP

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)