

State of Colorado
Energy & Carbon Management Commission

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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 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>LARAMIE ENERGY LLC</u>	Operator No: <u>10433</u>	Phone Numbers Phone: <u>(970) 9019007</u> Mobile: <u>()</u>
Address: <u>1700 LINCOLN ST STE 3950</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80203</u>
Contact Person: <u>Matt Kasten</u>	Email: <u>mkasten@laramie-energy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 41247 Initial Form 27 Document #: 404103967

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: <u>PIT</u>	Facility ID: <u>292806</u>	API #: _____	County Name: <u>MESA</u>
Facility Name: <u>SOUTH SHALE RIDGE 15-23</u>	Latitude: <u>39.358500</u>	Longitude: <u>-108.317600</u>	
** correct Lat/Long if needed: Latitude: <u>39.356249</u>		Longitude: <u>-108.317649</u>	
QtrQtr: <u>NESW</u>	Sec: <u>15</u>	Twp: <u>8S</u>	Range: <u>98W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>
Facility Type: <u>WELL</u>	Facility ID: _____	API #: <u>077-09438</u>	County Name: <u>MESA</u>
Facility Name: <u>HOMER DEEP UNIT 15-23</u>	Latitude: <u>39.356360</u>	Longitude: <u>-108.317590</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NESW</u>	Sec: <u>15</u>	Twp: <u>8S</u>	Range: <u>98W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u>

Facility Type: LOCATION Facility ID: 311760 API #: _____ County Name: MESA
Facility Name: Homer Deep Unit 15-23 Pad Latitude: 39.356360 Longitude: -108.317590
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NESW Sec: 15 Twp: 8S Range: 98W Meridian: 6 Sensitive Area? Yes

Facility Type: TANK BATTERY Facility ID: 479305 API #: _____ County Name: MESA
Facility Name: Homer Deep Tank Battery 15-23 Latitude: 39.356646 Longitude: -108.318079
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NESW Sec: 15 Twp: 8S Range: 98W Meridian: 6 Sensitive Area? No

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Non Crop Land

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:

- | | | |
|--|--|---|
| <input type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input checked="" type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | TBD - no anticipated waste at this moment |
| <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	1000sqft	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.

Facility decommission of entire site. Well will be P&A'd along with equipment removed for facility decommission.

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):

Well - After P&A, wellhead area will be characterized by PID and sample(s) will be collected from most impacted area.
 Tank - After removal of battery, area will be characterized by PID and sample(s) will be collected from most impacted area.
 Sep/Meter - After removal area will be characterized by PID and sample(s) will be collected from most impacted area.
 UPDATE: Pit - Pit appears to be under interim, and will be investigated by heavy equipment. Once determined within pit area, walls and bottom will be characterized by PID and sample(s) will be collected from most impacted area. Aerial does not display pit, but old plat on database shows dimensions and offset from well. All samples collected will be analyzed for 915. Pit sampling identified impacts. Source material will be excavated and hauled off for disposal for clearance.

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):

Due to organics only identified in pit northwall and west wall, excavated material will be removed and delineated. Inorganics identified within pit area will be resampled at intervals of 1' for inorganics to justify if 915.b will be suitable for area. Currently, pit will be reclaimed under ~4 - 6' of material. 915.b could work if data represents that impacts will be below root zone.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 9

 Highest concentration of TPH (mg/kg)

Number of soil samples exceeding 915-1 5

 Highest concentration of SAR

Was the areal and vertical extent of soil contamination delineated? No

BTEX > 915-1 No

Approximate areal extent (square feet) 1000

Vertical Extent > 915-1 (in feet) 15

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?

Backgrounds will be collected from native soils near site.

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

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.

Source material is needing to be removed, heavy equipment will be utilized.

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.

Location is set to be P&A'd late spring 2025. Once sampling is completed analysis will determine next steps for remediation. If impacts are not identified, project will be requested for closure within 1 month of original sampling date. If impacts are discovered, timeline for closure will be delayed due to remediation scope change and will be updated on SF27(s). Estimated closure is late August 25, with reclaim to follow in Fall.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) 40

_____ 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.

Based on the current COI provided by Acord, Laramie Energy has a total of \$16MM of sudden & accidental pollution. The primary layer in the General Liability Policy is \$1MM per occurrence and a \$15MM umbrella totaling \$16MM. Estimated cost is less than \$130,000 for sampling, closure and reclamation.

Operator anticipates the remaining cost for this project to be: \$ 130000

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: _____

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.

TBD - Laramie will work with the BLM to provide reclamation plan after on-site meeting is conducted. SF27(s) will include plan.

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). 03/24/2025

Proposed site investigation commencement. 04/07/2025

Proposed completion of site investigation. _____

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

Laramie is requesting: FOR PIT Delineation only:

1. Project to remain under RSSL; groundwater not encountered and is projected to be greater than 100' bgs due to area and surface water being ~225' below site.
2. Reduced analyte suite for PIT DELINEATION of only TPH (G/D/O), SAR and pH. Organic exceedances identified will be excavated and hauled for disposal.
- 2a. Pit exceedances in pit for only inorganics will be sampled throughout various spots and depths to confirm inorganic data and if supports depths, 915.b will be pursued to leave inorganic findings in-situ.

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

Signed: Matt Kasten Title: SR. Env Coordinator Submit Date: 07/07/2025 Email: mkasten@laramie-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: John Heil Date: 07/08/2025 Remediation Project Number: 41247 **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**

404268675	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404268702	ANALYTICAL DATA SUMMARY TABLE(S)
404268703	SOIL SAMPLE LOCATION MAP
404268704	PHOTO DOCUMENTATION
404268706	ANALYTICAL RESULTS
404268707	ANALYTICAL RESULTS
404270392	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments**User Group****Comment****Comment Date**

Environmental	ECMC approves the request for pit exceedances in pit for only inorganics will be sampled throughout various spots and depths to confirm inorganic data and if supports depths, 915.b will be pursued to leave inorganic findings in-situ.	07/08/2025
Environmental	ECMC approves the reduced analyte suite for PIT DELINEATION of only TPH (G/D/O), SAR and pH.	07/08/2025
Environmental	ECMC approves the request for the project to remain under RSSL.	07/08/2025

Total: 3 comment(s)