

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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404290735
Receive Date:
07/25/2025

Report taken by:
Kari Brown

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>MAGPIE OPERATING INC</u> | Operator No: <u>52530</u> | Phone Numbers |
| Address: <u>2707 SOUTH COUNTY RD 11</u> | | Phone: <u>(970) 669-6308</u> |
| City: <u>LOVELAND</u> | State: <u>CO</u> | Zip: <u>80537</u> |
| Contact Person: <u>Seyma Yilmaz</u> | Email: <u>seyma.magpieoil@gmail.com</u> | Mobile: <u>()</u> |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 32769 Initial Form 27 Document #: 403566244

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>WELL</u> | Facility ID: _____ | API #: <u>123-05153</u> | County Name: <u>WELD</u> |
| Facility Name: <u>SCHRADER 1</u> | Latitude: <u>40.347489</u> | Longitude: <u>-105.049524</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>NENW</u> | Sec: <u>6</u> | Twp: <u>4N</u> | Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

| | | | |
|--|----------------------------|-------------------------------|---|
| Facility Type: <u>LOCATION</u> | Facility ID: <u>317494</u> | API #: _____ | County Name: <u>WELD</u> |
| Facility Name: <u>SCHRADER-64N68W 6NENW</u> | Latitude: <u>40.347514</u> | Longitude: <u>-105.049540</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>NENW</u> | Sec: <u>6</u> | Twp: <u>4N</u> | Range: <u>68W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

Facility Type: SPILL OR RELEASE Facility ID: 488432 API #: _____ County Name: WELD
Facility Name: Schrader 1 Latitude: 40.347489 Longitude: -105.049524
** correct Lat/Long if needed: Latitude: _____ Longitude: _____
QtrQtr: NENW Sec: 6 Twp: 4N Range: 68W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SC Most Sensitive Adjacent Land Use Farmland

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

Residences ~500' west and ~500' southwest. Site is within HPH (Bald Eagle Active Nest Half Mile).

SITE INVESTIGATION PLAN

DENIED

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 | GROUNDWATER | NA | Not encountered |
| Yes | SOILS | TBD | Soil samples/laboratory analytical results |

INITIAL ACTION SUMMARY

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

Excavation was conducted on 11/05/2024 and 11/08/2024 at the FL-SS-02 and FL-SS-N01 sample locations from the 9/9/2024 sampling. Confirmation samples were collected on 3/17/2025 along with additional samples at the wellhead per COA on approved Form 27S (Document #404078765). Notification for the 3/17/2025 sampling was sent to ECOM. Analytical results showed TPH exceedances at WH-SS-W03, WH-S03, FL-SS-N02. Additionally, Benzo(a)-anthracene exceedances were seen at WH-SS-S03 and FL-SS-N02.

After consultation with CPW and approval to commence work during Eagle Nesting Season, excavation was conducted on 6/2/2025 along the South and West wall at the Wellhead excavation and the North wall at the Flowline endpoint excavation. 3 samples were collected on 6/2/2025 and analyzed for BTEX, Naphthalene, TPH, 1,2,4-TMB, 1,3,5-TMB, 1-Methylnaphthalene, 2-Methylnaphthalene, Benzo(a)-anthracene, and pH. After excavation and samples were collected, the excavation areas were back filled per the request of the surface owner. Analytical results indicated there were no impacts remaining.

The Flowline endpoint has been fully delineated; no further investigation is needed.

Due to the extents of the Wellhead Excavation, additional samples will be collected along the along each walls for full delineation, a total of 4 additional samples will be collected. The wellhead excavation is 625 square feet; 2 floor samples were collected on 10/2/2024 confirming impacts at the floor had been removed. The additional samples along the walls will be collected utilizing a power auger to a depth of 5'. Proposed sample location map is attached.

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):

Due to the extents of the Wellhead Excavation, additional samples will be collected along the along each walls for full delineation, a total of 4 additional samples will be collected. The wellhead excavation is 625 square feet; 2 floor samples were collected on 10/2/2024 confirming impacts at the floor had been removed. The additional samples along the walls will be collected utilizing a power auger to a depth of 5'. Samples will be analyzed for BTEX, Naphthalene, TPH, 1,2,4-TMB, 1,3,5-TMB, 1-Methylnaphthalene, 2-Methylnaphthalene, Benzo(a)-anthracene, and pH. Proposed sample location map is attached.

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

Number of soil samples collected 33

Number of soil samples exceeding 915-1 18

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

Approximate areal extent (square feet) 776

NA / ND

-- Highest concentration of TPH (mg/kg) 4286

-- Highest concentration of SAR 8.36

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 6

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

 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?

On 12/15/2023, 2 BG samples (BG01 @4' and BG02 @4') were collected. Additional samples were collected on 9/9/2024 at BG01 (5' and 7' bgs) and BG02 5' and 7' bgs). Background pH levels are 8.54, Arsenic Local Clean-up Levels are 7.0375 mg/kg (1.25 * 5.63 mg/kg), Barium Local Clean-up Levels are 258.75 mg/kg (1.25 * 207 mg/kg), and Selenium Local Clean-up Levels are 0.41375 mg/kg (1.25 * 0.331 mg/kg).

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) 177

Volume of liquid waste (barrels) 0

Is further site investigation required?

Due to the extents of the Wellhead Excavation, additional samples will be collected along the along each walls for full delineation, a total of 4 additional samples will be collected. The wellhead excavation is 625 square feet; 2 floor samples were collected on 10/2/2024 confirming impacts at the floor had been removed. The additional samples along the walls will be collected utilizing a power auger to a depth of 5'. Samples will be analyzed for BTEX, Naphthalene, TPH, 1,2,4-TMB, 1,3,5-TMB, 1-Methylnaphthalene, 2-Methylnaphthalene, Benzo(a)-anthracene, and pH. Proposed sample location map is attached.

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.

Facility has been decommissioned. Impacted soils have been removed and transported to Pawnee Waste.

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.

Facility has been decommissioned. Impacted soils have been removed and disposed of at Pawnee Waste.

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

- Yes _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____ 140
- _____ 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 Site Investigation Report

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.

Maggie Operating has complied with General Liability Insurance requirements per Rule 705 and is fully bonded per Rule 702 to fully address the anticipated costs of remediation. This is the initial assessment for WH/FL closure the costs represent the estimated cost for labor and analytical samples.

Operator anticipates the remaining cost for this project to be: \$ 5000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards 177

E&P waste (solid) description Contaminated Soils

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Pawnee Waste

Volume of E&P Waste (liquid) in barrels 0

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 site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules or as 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? _____

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. 10/01/2025

Proposed date of completion of Reclamation. 10/31/2026

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. 10/22/2024

Actual Spill or Release date, or date of discovery. 12/15/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/01/2023

Proposed site investigation commencement. 12/01/2023

Proposed completion of site investigation. 08/18/2025

REMEDIAL ACTION DATES

Proposed start date of Remediation. 12/01/2023

Proposed date of completion of Remediation. 09/01/2025

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

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: 07/25/2025

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: _____

Date: _____

Remediation Project Number: 32769

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**

| | |
|-----------|----------------------------------|
| 404290735 | FORM 27 DENIED |
| 404294566 | ANALYTICAL DATA SUMMARY TABLE(S) |
| 404294567 | ANALYTICAL RESULTS |
| 404294799 | ANALYTICAL DATA SUMMARY TABLE(S) |
| 404294801 | SOIL SAMPLE LOCATION MAP |
| 404294804 | CORRESPONDENCE |
| 404294806 | CORRESPONDENCE |
| 404294808 | DISPOSAL MANIFESTS |
| 404296299 | FORM 27-SUPPLEMENTAL-SUBMITTED |

Total Attach: 9 Files

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

| | | |
|---------------|---|------------|
| Environmental | <p>ECMC has denied this form.</p> <ul style="list-style-type: none"> -Scales represented on maps are inconsistent and do not accurately depict the excavation extent represented in the lat/longs provided. -Missing labels on sample points on provided maps. -Inadequate locations of floor samples. -Inadequate number and depth of proposed sidewall sample points. -Inadequate sampling timeline (as proposed in 7/25/25 email and required in denied Form 27 Doc No 404242187) <p>ECMC has emailed Operator (Doc No 1561616) a more detailed list of these insufficiencies. Operator is required to resubmit an updated Form 27 immediately, but no later than within 48 hours. The deadline for soil sampling remains at two weeks from submittal of this Form 27, August 08, 2025.</p> | 07/28/2025 |
|---------------|---|------------|

Total: 1 comment(s)