

**State of Colorado**  
**Energy & Carbon Management Commission**

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



Document Number:  
404276732  
Receive Date:  
07/11/2025

Report taken by:  
Alexander Ahmadian

**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 ECOM 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>PAINTED PEGASUS PETROLEUM LLC</u>  | Operator No: <u>10711</u>           | <b>Phone Numbers</b>          |
| Address: <u>16820 BARKER SPRINGS RD #521</u>            |                                     | Phone: <u>(303) 894-2100</u>  |
| City: <u>HOUSTON</u> State: <u>TX</u> Zip: <u>77084</u> |                                     | Mobile: <u>(303) 905-5341</u> |
| Contact Person: <u>James Hix - East OWP EPS</u>         | Email: <u>james.hix@state.co.us</u> |                               |

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 37923 Initial Form 27 Document #: 403981208

**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>LOCATION</u>                   | Facility ID: <u>320523</u> | API #: _____                  | County Name: <u>ADAMS</u>                                      |
| Facility Name: <u>ABBOTT-61S64W 10SWSE (OWP)</u> | Latitude: <u>39.972640</u> | Longitude: <u>-104.534670</u> |  |
| ** correct Lat/Long if needed: Latitude: _____   |                            | Longitude: _____              |  |
| QtrQtr: <u>SWSE</u>                              | Sec: <u>10</u>             | Twp: <u>1S</u>                | Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>No</u> |

**SITE CONDITIONS**

General soil type - USCS Classifications SM 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**

There are no DWR Permitted Water Wells mapped w/in 1/4-mile of the Location. DWR Permit #221717- Receipt #0451919A (1999)[Upper Arapahoe (Ka), SWL = 140 ft, Top of Perf Casing = 240 ft, TD = 440 ft, ~1910 ft WNW] No surface water within 1/4 mile. No NWI Mapped Wetlands w/in 1/4 mile - nearest Freshwater Emergent wetland ~1395 ft SE to unnamed intermittent tributary drainage to Prospect Reservoir. There are no CPW Mapped HPH located within 1/4 mile of the Location. There are no residential building units (RBU) within 1/4 mile. Nearest RBU is ~2025 ft West.

**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                        |
|--------------|----------------|------------------|---------------------------------------|
| UNDETERMINED | SOILS          | UNKNOWN          | VISUALLY, FIELD SCREENING, ANALYTICAL |

**INITIAL ACTION SUMMARY**

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

This oil and gas Location is in the Colorado Energy and Carbon Management Commission (ECMC) Orphaned Well Program (OWP). This Form 27 Supplemental presents the results of site investigation activities performed during decommissioning of Oil and Gas Facilities, specifically cut and cap sampling activities following plugging and abandonment (PA) of the well. Field screening was performed of the four sidewalls and base of the wellhead excavation to investigate for evidence of E&P Waste impacts. Soil samples were submitted to an accredited environmental laboratory for analysis of Table 915-1 parameters from the excavation sidewall soils that exhibited E&P Waste impacts; or from the expected downgradient sidewall in the absence of E&P Waste impact; and from the base of the excavation. Soil samples were collected and analyzed in accordance with Colorado ECMC 900 Series 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 ):

Grab soil samples will be collected from areas most likely to exhibit E&P Waste impacts. Soil samples will be submitted for analysis of Table 915-1 parameters including organic compounds (TPH ranges C6-C36; BTEX; 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene, PAH) and inorganic compounds [metals (As, Ba, Cd, Cu, Cr6+, Pb, Ni, Ag, Zn) and soil suitability for reclamation parameters (pH, EC, SAR, hot water soluble boron)].

**Proposed Groundwater Sampling**

Will groundwater samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

Groundwater samples are not expected to be collected as part of this investigation. If encountered in sufficient quantity to enable sample collection, a grab groundwater sample or samples will be collected and submitted for analysis of organic compounds (BTEX; Naphthalene; 1,2,4-Trimethylbenzene; 1,3,5-Trimethylbenzene) and inorganic parameters (total dissolved solids (TDS), chloride ion, sulfate ion).

**Proposed Surface Water Sampling**

Will surface water samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

Surface water samples are not expected to be collected as part of this investigation.

**Additional Investigative Actions**

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

No additional alternative investigative actions are expected to be conducted as part of this site investigation.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 2

Number of soil samples exceeding 915-1 1

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

Approximate areal extent (square feet) 300

### NA / ND

-- Highest concentration of TPH (mg/kg) 719

-- Highest concentration of SAR 7.29

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 10

### 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?

Site-specific background soil samples, 320523\_BK01 @3', 320523\_BK02 @3', 320523\_BK03 @3', collected from the northwest, south, and southeast of the wellhead excavation, were submitted for laboratory analysis of Table 915-1 metals and soil suitability for reclamation parameters. Analytical results indicate that the pH of 8.52 standard units (s.u.) in sample 320523\_BK03 @3' was above the Table 915-1 pH level of 8.3 s.u. Concentrations of arsenic and barium were reported above Table 915-1 soil screening levels (SSL) in all three background soil samples which suggests that these metal concentrations are naturally occurring.

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?

Further site investigation is required to define the lateral and vertical extent of E&P Waste impacts (TPH, pH, and SAR) at the Abbott #10-43 wellhead reported in the excavation base sample, 320523\_WH01\_B01 @10'. Total petroleum hydrocarbons (TPH) were reported at 719 mg/kg, pH (9.87 s.u.), SAR (7.29), and lead (28.7 mg/kg). Groundwater was not encountered in the wellhead excavation. Based on a review of DWR permitted water wells in the area the depth to groundwater is expected to lie at greater than 240 feet bgs. The OWP requests to use the Table 915-1 residential soil screening levels and site-specific background levels.

## 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.

If E&P Waste impacts are encountered during decommissioning of Oil and Gas Facilities, approximately 10 cubic yards of impacted soils will be excavated, temporarily stockpiled on location, and hauled to a commercial disposal facility.

### REMEDICATION 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.

If E&P Waste impacted soils are encountered, approximately 10 cubic yards of the soils will be excavated and removed. If the horizontal and vertical extent of the E&P Waste impacts cannot be defined or removed during this initial action, then additional site investigation and remediation will be performed at a later date under an approved supplemental Form 27. Site data will be evaluated and remediation technologies implemented to meet Table 915-1 soil residential screening levels, protection of groundwater screening levels, or Table 915-1 groundwater and WQCC Regulation 41 numeric and narrative levels as applicable to site conditions.

**Soil Remediation Summary**

In Situ

Ex Situ

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

- \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_
- \_\_\_\_\_ 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

A Form 27 Supplemental will be submitted within 90 days from the receipt of results.

### Request Alternative Reporting Schedule:

Semi-Annually  Annually  Other

The OWP requests an annual reporting schedule.

### 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.

The former PAINTED PEGASUS PETROLEUM LLC - ABBOTT 10-43 (OWP) oil and gas well is in the ECMC Orphaned Well Program. The former Operator's bond and other funding sources will be used to plug and abandon (PA) the well, investigate, remediate, and reclaim the location.

Operator anticipates the remaining cost for this project to be: \$ 32102 \_\_\_\_\_

## 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: \_\_\_\_\_

# 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 Colorado ECMC OWP will prepare a reclamation plan to reclaim this oil and gas location in accordance with 1000 Series Rules including grading/recontouring of disturbed areas. The reclamation plan will be implemented under a separate scope of work. Final reclamation will be conducted per ECMC 1000 Series Rules and prioritized based on OWP ranking, project funding, and staff availability. The reclamation scope will include a plan to address and avoid any effect on reclamation from Table 915-1 inorganic and soil suitability for reclamation parameters.

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. 10/22/2024

Actual Spill or Release date, or date of discovery. \_\_\_\_\_

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/04/2024

Proposed site investigation commencement. 01/06/2025

Proposed completion of site investigation. 03/10/2025

### 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**

The former PAINTED PEGASUS PETROLEUM LLC - 10711 ABBOTT #10-43 (OWP) oil and gas well (API #05-001-09533) ABBOTT-61S64W 10SWSE (Location ID #320523) is in the ECMC Orphaned Well Program ("OWP"). This Form 27 Supplemental presents the cut and cap soil sample results following the plugging and abandonment (PA) of the well. Pre-plugging methane monitoring did not indicate the presence of measurable methane leaks. Confirmation soil sampling conducted on 03/10/2025 included collection of a north sidewall soil sample, 320523\_WH01\_N01 @7', and an excavation base sample, 320523\_WH01\_B01 @10'. Analytical results report that total petroleum hydrocarbons (TPH) were 719 mg/kg in the base soil sample that were above the Table 915-1 TPH cleanup goal of 500 mg/kg. Concentrations of benzene, toluene, ethylbenzene, xylenes (BTEX); 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, and polycyclic aromatic hydrocarbon (PAH) compounds were either not detected or were reported at concentrations below Table 915-1 soil screening levels (SSL) in these samples. Laboratory results indicated that the pH (9.87 s.u.) and SAR (7.29) in basal soil sample were reported above the Table 915-1 soil suitability for reclamation levels for these parameters. These E&P Waste impacts will be addressed during a future OWP project based on OWP site priority rank and OWP priority score. Three site-specific background soil samples were collected and submitted for laboratory analysis of Table 915-1 metals and soil suitability for reclamation parameters. The pH results (8.52 s.u.) for background sample, 320523\_BK03 @3' were above the Table 915-1 pH level of 8.3 s.u. Arsenic was reported above the Table 915-1 residential soil screening level (SSL) and barium was reported above the Table 915-1 protection of groundwater SSL in multiple samples including the three site-specific background samples. Groundwater is expected to lie at a depth greater than 240 feet bgs based on a review of area water well records. Further site investigation is required to define the vertical and lateral extent of TPH concentrations at the wellhead. The OWP requests to use Table 915-1 residential SSL and site specific background concentration levels. Further site investigation and remediation will proceed under Remediation Project #37923.

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

Signed: James Hix

Title: East OWP EPS

Submit Date: 07/11/2025

Email: james.hix@state.co.us

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: Alexander Ahmadian

Date: 08/04/2025

Remediation Project Number: 37923

**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**

|           |  |
|-----------|--|
| 404276732 | INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL) |
| 404276824 | SITE INVESTIGATION REPORT                        |
| 404276826 | ANALYTICAL RESULTS                               |
| 404276840 | MONITORING REPORT                                |
| 404304341 | FORM 27-SUPPLEMENTAL-SUBMITTED                   |

Total Attach: 5 Files

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

|               |  |            |
|---------------|--|------------|
| Environmental | ECMC approves Operator's request for use of Residential SSLs based on the depth to groundwater and the local lithology suggesting a pathway to groundwater at this location is not likely. | 08/04/2025 |
| Environmental | ECMC agrees to an annual reporting schedule.   | 08/04/2025 |

Total: 2 comment(s)