

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

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Document Number:  
404183071

Receive Date:  
\_\_\_\_\_

Report taken by:  
\_\_\_\_\_

**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>OWN RESOURCES OPERATING LLC</u>	Operator No: <u>10699</u>	<b>Phone Numbers</b>
Address: <u>305 S RIDGE STREET #6279</u>	Phone: <u>(970) 332-3585</u>	
City: <u>BRECKENRIDGE</u> State: <u>CO</u> Zip: <u>80424</u>	Mobile: <u>(713) 628-7339</u>	
Contact Person: <u>Niels Phaf</u>	Email: <u>niels.phaf@ownresources.com</u>	

**PROJECT, PURPOSE & SITE INFORMATION**

**PROJECT INFORMATION**

Remediation Project #: 16193 Initial Form 27 Document #: 402549456

**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>SPILL OR RELEASE</u>	Facility ID: <u>478494</u>	API #: _____	County Name: <u>YUMA</u>
Facility Name: <u>SPILL/RELEASE POINT</u>	Latitude: <u>40.028627</u>	Longitude: <u>-102.305692</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>29</u>	Twp: <u>1N</u>	Range: <u>44W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

**SITE CONDITIONS**

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use CREP

Is domestic water well within 1/4 mile? Yes 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**

Location lies within the following: Domestic well approx. 522' east, water depth 120', Domestic well approx. 1597' northeast, water depth 112', Livestock well approx. 2262' northwest, water depth 155'. Designated groundwater management area, Designated basin, High Priority Habitat(s): Mule Deer Severe Winter Range.

**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
Yes	SOILS	Moderate	Soil Analysis

**INITIAL ACTION SUMMARY**

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

Initial Summary from Form 19 submitted 11/05/2020, Doc#402525705.  
 A poly pipe fuse failure resulted in a produced water release. The affected line was promptly isolated and evacuated. No surface water was present for collection at the time of the incident. The estimated release volume is between 10–15 barrels. The impacted area, approximately 10 feet by 132 feet, line has been excavated and repaired. Soil samples were collected and submitted to a laboratory for analysis - at the time for soil suitability only. Remediation treatment will be determined based on the lab results. Please refer to the attached maps for additional site details.

**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 ):

On February of 2025, four additional soil samples (Sample #1, Sample #2, and Sample #3) were collected from within the impacted area, along with one background sample taken approximately 45 feet outside the spill zone. The attached map identifies the locations the collected samples relative to the affected area. Soil samples were analyzed to full Table 915-1, however the 8260 GBTEXN 915 analyses was completed outside of allotted holding times. The analyses will be use only for field screening and this Form 27S is completed based on the results of these samples.

Previous samples collected from November 2020 at the time of the spill (5) and one progress confirmation sample March 2022. these were at the time not analyzed against full table Table 915-1. Only analyzed for soil suitability. Operator Table and analytical are attached for completeness.

**Proposed Groundwater Sampling**

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

No groundwater was encountered

**Proposed Surface Water Sampling**

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

No surface water was encountered

**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 4

Number of soil samples exceeding 915-1 3

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

Approximate areal extent (square feet) 3817

### NA / ND

ND Highest concentration of TPH (mg/kg) \_\_\_\_\_

-- Highest concentration of SAR 6.48

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 2

### 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?

A background sample was collected from a comparable, nearby, non-impacted native soils and analyzed to full table 915-1. Analysis show background sample meets required levels.

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? Yes

### SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Exceeded levels below will be address by in-place treatment. Soil samples analysis received April 2025 from Summit Scientific shows the following:  
1. EC levels for all samples are now below the limits  
2. SAR levels for Samples #1 and #2 are now below the limits, while Sample #3 slightly elevated at 6.48.  
3. pH levels in all three samples exceeded the acceptable limit - all > 9.7  
4. Boron exceeded levels on all three spill samples-> 6.8  
5. Arsenic levels were slightly elevated ranging from .69 to .78. However the exceeded levels are close to background indicating naturally occurring in this area.

Soil sample results show significant progress since 2020. Exceeded levels are decreasing, see attached Summary Tables and Analytical.

### 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.

With the salt content addressed, the focus of remediation efforts will shift toward managing elevated boron and correcting pH.  
 1. pH: All samples >8.3; soil will be treated with sulfur to lower pH to acceptable range.  
 2. Boron: In consultation with our local agronomist, we have defined a dual approach to address elevated boron levels. We will apply "Soft Soil" to enhance overall soil suitability, in combination with ongoing decompaction efforts to improve moisture infiltration to the ground better. Additionally, we will consult the local soil conservation office to select approved boron-tolerant seed species that can aid in reducing boron.  
 3. Arsenic: slightly above Table 915-1 but consistent with background; NFA requested.

Remediation will continue in the summer of 2025. Two confirmation samples will be taken and analyzed for Soil Suitability for Reclamation in Qrt.-3 2026. Estimated time to achieve NFA: 1-2 years.

**Soil Remediation Summary**

<input checked="" type="checkbox"/> <b>In Situ</b>	<input type="checkbox"/> <b>Ex Situ</b>
_____ 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 # _____
Yes _____ Natural Attenuation	_____ Excavate and onsite remediation
Yes _____ Other Sift Soil and boron-tolerant seed species _____	_____ 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.

Own Resources Operating is following the minimum insurance requirements of Rule 705.b and these insurances are registered with the ECMC as per Rules 705.d and 705.e. The ECMC requires a minimum of \$5M of liability coverage, which exceeds Remediation Costs. We also have an approved assurance plan under option 5.

Operator anticipates the remaining cost for this project to be: \$ 500 \_\_\_\_\_

## 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 reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The site was originally treated with Gypsum in March 2021, current impacted area documented in the photobook attached shows some vegetative establishment due to persistent soil compaction, boron, and high pH. In summer 2025, the site will be re-entered to alleviate compaction across the entire disturbed area. No regrading is necessary as the existing grade matches surrounding topography and maintains natural drainage. Following compaction alleviation, soil conditioning, and sulfur will be applied using rates recommended by the local agronomist. The site will then be seeded using a CREP-approved native mix that includes drought- and boron-tolerant species. Seeding will be performed via no-till drill or broadcasted soil disturbance and weed-free straw will be applied and crimped to reduce erosion and retain moisture. This location will be monitored for 1-2 years for treatment program noxious weeds and visually verify native species reestablishment.

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? Yes \_\_\_\_\_

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 03/10/2021

Proposed date of completion of Reclamation. 10/31/2027

## 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. 11/04/2020

Actual Spill or Release date, or date of discovery. 11/03/2020

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/03/2020

Proposed site investigation commencement. 11/03/2020

Proposed completion of site investigation. 02/03/2025

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 11/05/2020

Proposed date of completion of Remediation. 11/01/2026

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:

The updated schedule reflects findings from soil sampling and field screening conducted in February 2025. Analytical results indicated a revised reclamation approach is needed to improve site conditions.

**OPERATOR COMMENT**

Operator will address the COAs on Doc# 403683710 as follows:

- 1). Confirmation soil samples collected, in February 2025 and analyzed to full Table 915-1
- 2). An updated soil sampling map that includes scale, an aerial showing locations of field screening, samples and background is attached for review.
- 3). Operator Summary Table for all analytical are attached for review. However, two of the sample events were not analyzed to full table 915-1, only samples taken in February were analyzed to full table.
- 4). A new remediation plan is being implemented that addresses the previously submitted one.
- 5). Groundwater was not encountered.
- 6). New samples, field inspection and analysis shows improvement in delineation of the impacted area.

Note regarding hold times: The attached revised laboratory report includes appropriate data qualifiers in accordance with EPA SW-846 Chapter 4, Table 4-1 and Method 5035A, Section 8.3, which allow for flexibility in holding time exceedances when preservation, storage, and analytical quality control (QC) demonstrate that volatile organic compound (VOC) concentrations have not been adversely affected. Summit Scientific confirms that affected samples were properly preserved (per 5035A protocols), stored under compliant conditions, and analyzed using EPA Methods 8015 and 8260 with all associated batch QC including method blanks, laboratory control samples (LCS), matrix spikes (MS), and surrogates meeting acceptance criteria outlined in the respective methods.

These QC results, included in the laboratory report, provide assurance that the data are scientifically valid, technically defensible, and suitable for regulatory use. We respectfully request ECMC review this submittal with consideration of the provisions outlined in SW-846 Chapter 4 and Method 5035A, which recognize the importance of data quality and preservation over rigid holding time limits in certain cases.

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

Signed: Azucena Torres

Title: Reclamation & Remediation

Submit Date: \_\_\_\_\_

Email: azucena.torres@ownresources.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: 16193

**COA Type**

**Description**

0 COA	
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**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.

<b>Att Doc Num</b>	<b>Name</b>
404310253	ANALYTICAL DATA SUMMARY TABLE(S)
404310254	ANALYTICAL DATA SUMMARY TABLE(S)
404310255	PHOTO DOCUMENTATION
404310257	SOIL SAMPLE LOCATION MAP
404310259	ANALYTICAL RESULTS
404310260	CORRESPONDENCE
404310262	ANALYTICAL RESULTS
404310263	ANALYTICAL RESULTS
404310332	ANALYTICAL DATA SUMMARY TABLE(S)
404310613	CORRESPONDENCE

Total Attach: 10 Files

**General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
		Stamp Upon Approval

Total: 0 comment(s)